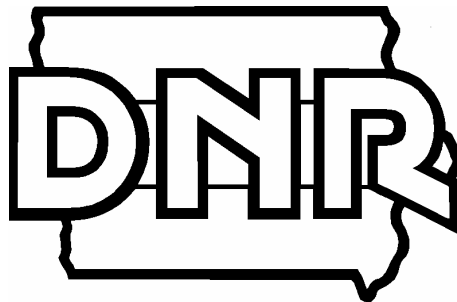


Final Report

Permit Fee & Funding Structures for Solid Waste

Iowa Department of Natural Resources
Energy and Waste Management Bureau



January 2003

In conjunction with



Reed, Stowe & Yanke, LLC

January 15, 2003



Mr. Jeff A. Myrom
Executive Officer, Policy and Budget Development
Energy and Waste Management Bureau
Wallace Building
502 E. 9th Street
Des Moines, Iowa 50319

Subject: Final Report – Permit Fee & Funding Structures for Solid Waste

Dear Mr. Myrom:

R. W. Beck, Inc., in conjunction with Reed, Stowe & Yanke, LLC, is pleased to provide the final report for the Permit Fee and Funding Structures for Solid Waste study. We have revised the draft report per your review comments and input from the advisory committee.

Thank you for the opportunity to provide these services.

Sincerely,

R. W. BECK, INC.

A handwritten signature in cursive script that reads 'Robert W. Craggs'.

Robert Craggs
Senior Director

IDNR PERMIT FEE STRUCTURE

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This report has been prepared for the use of the client for the specific purposes identified in the report. The conclusions, observations and recommendations contained herein attributed to R. W. Beck, Inc. (R. W. Beck) constitute the opinions of R. W. Beck. To the extent that statements, information and opinions provided by the client or others have been used in the preparation of this report, R. W. Beck has relied upon the same to be accurate, and for which no assurances are intended and no representations or warranties are made. R. W. Beck makes no certification and gives no assurances except as explicitly set forth in this report.

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Section 1

OVERVIEW

The Energy & Waste Management Bureau (E&WMB) of the Iowa Department of Natural Resources (DNR) issued a request for proposals (RFP) to explore a permit fee funding structure for sanitary disposal projects (SDPs). Presently, all funding for E&WMB permitting activities is derived from a tonnage fee on solid waste landfilled in Iowa. The DNR is interested in exploring funding alternatives because the tonnage fee funding system provides an adequate level of revenue, but is problematic as structured. In particular, stakeholders and the DNR have identified two concerns:

- Funding of new services and programs requires more solid waste to be landfilled; and
- The fee structure does not equitably distribute costs because it places the full cost of permitting all 300+ SDPs on 60 municipal solid waste landfills.

In undertaking the exploration of a permit fee system, the DNR was committed to engaging stakeholders in a transparent and open process. To that end, a project team consisting of R. W. Beck, Inc. (Beck), in conjunction with Reed, Stowe and Yanke, LLC (RS&Y), was retained as a third-party consultant and auditor. Moreover, all meetings were open to the public and an advisory committee representing a wide variety of permitted SDPs was formed. The advisory committee's membership included representatives from the following agencies and organizations:

- Bluestem Solid Waste Agency;
- Chamness Technology, Inc.;
- Iowa DNR Field Office #2 (Mason City);
- Iowa DNR Field Office #4 (Atlantic);
- Iowa Recycling Association;
- Iowa Society of Solid Waste Operations;
- John Deere & Company;
- Metro Waste Authority;
- Mid-American Energy;
- Plymouth, Cherokee, Buena Vista Comprehensive Planning Area; and
- Waste Management of Iowa;

The objective of the study was to complete a critical analysis of present permitting activities and expenditures in order to formulate an improved fee structure that provides adequate funding to permit, inspect, and regulate SDPs, while remaining

Section 1

consistent with Iowa's waste reduction and diversion policies. To achieve this goal, the following primary tasks were completed:

- Surveyed and analyzed the permit fee and funding structures of states surrounding Iowa and model states across the nation;
- Conducted a full-cost accounting analysis of DNR resources related to SDPs permitting, inspection, and compliance;
- Gathered feedback and input from the advisory committee and stakeholders; and
- Provided a recommended fee structure, based on model permit fee structures in other states, and values based on a full-cost analysis of actual expenditures by the DNR.

This report addresses each of the primary tasks listed above.

Section 2

STATE SURVEY RESULTS

Overview

The Project Team developed a written survey to gather information from state environmental management agency representatives of the following states:

- Minnesota
- Pennsylvania
- Ohio
- California
- Florida
- Nebraska¹
- Texas
- Missouri
- Arkansas
- Virginia
- New Jersey
- Illinois¹

The written survey was forwarded via facsimile to select representatives from the state agencies responsible for solid waste management in each of the designated states. A copy of the written survey can be found in Appendix A. The Project Team then contacted each state's designated representative via telephone to clarify the survey questions, request information, and gather information over the phone. Upon receiving input from the DNR and the Permit Fee Advisory Committee, staff forwarded the compiled information to each representative to confirm the information provided. Follow-up phone calls were conducted to clarify the information provided prior to finalizing the results.

Survey Results

A summary of the current solid waste permit fees and funding approach used by each of the twelve states surveyed was compiled. The summary description of the results represents the Project Team's characterization of the overall approach used by the designated states to fund solid waste permitting activities. A set of detailed tables characterizing specific survey question responses by individual state can be found in Appendix B for reference.

Minnesota

The state of Minnesota does not presently charge specific fees directly related to solid waste permitting activities. However, the Minnesota Pollution Control Agency

¹ Added to list per input from the Advisory Committee.

(MPCA) has recently invoked the use of a review policy whereby an applicant can reimburse the agency for anticipated costs of an expedited review of a solid waste facility permit. In addition, the state has levied a Solid Waste Tax (Tax) that generated nearly \$53 million this past fiscal year. This Tax is levied on all residential and commercial generators and is generally collected by waste haulers. Fifty percent or \$22 million, whichever is greater, of the revenue generated is remitted into the Solid Waste Fund to assist in funding Minnesota Pollution Control Agency activities. The remainder is deposited into the General Fund.

Texas

The State of Texas does not have a permit fee or an annual renewal fee. The State does however have a tipping fee surcharge based on a per ton (\$1.25) or a per cubic yard basis (\$.40 compacted) for all waste deposited at landfills.² Fifty percent of the revenue generated is used by the Texas Commission on Environmental Quality (TCEQ) to fund activities such as the MSW permitting, enforcement, and related solid waste support activities. The remaining 50% is provided to the State's Council of Governments for solid waste management program use. The surcharge tipping fee covers the permit process costs and no other revenues are used to cover these costs.

Pennsylvania

The state levies two sets of solid waste permit fees – initial facility fee and permit modification fee. The fees are applicable to landfills, solid waste processing facilities, resource recovery facilities, and transfer stations. The initial fees and modification fees are flat fees based on the specific type of facility. The initial fee is greater than the modification fee for each facility type. It is our understanding the revenue generated through the permit fees does not cover the costs of all permitting activities. In addition, the state recently enacted an additional \$4.00 per ton surcharge on all solid waste disposal as of June 29, 2002. Fifty percent of the revenue generated through the surcharge is allocated to recycling programs. The remaining 50% is used to cover solid waste management program costs.

Missouri

The permit fees for Missouri solid waste facilities are applicable for the life of the facility. In addition to the application fee, the applicant must reimburse the Missouri DNR for permit review costs, based on staff hours, up to a certain dollar amount. Permit fee revenue only accounts for a small portion of the permitting process costs. All revenues associated with the permitting fees are allocated 100% to the Solid Waste Management program. In addition, the state levies a \$2.00 per ton MSW landfill surcharge, and a \$1.33 per ton C&D landfill surcharge. These fees are dedicated to the Solid Waste Management Fund which finances activities such as planning,

² Texas landfills are not required by state law to have scales. Therefore, some landfills weigh all waste entering the landfill, while others estimate the amount of waste on a cubic yard basis.

enforcement, and grants. The revenue from the tonnage fees is precluded from being used to cover permitting costs.

Ohio

The state of Ohio levies two sets of solid waste permit fees – annual licensure and general permit fees. Both fee requirements apply to landfills, resource recovery facilities, transfer stations, and composting facilities. The licensure fees are based on actual facility throughput or a flat fee by facility type. Except for landfills, the general permit fees are a specified amount by facility type. MSW landfills include a rate schedule with separate permit fees for new facility and permit modification. It is our understanding that the project revenues do not cover the costs associated with permitting activities. The revenues through the licensure and permitting process are distributed in part to the local Boards of Health and the General Revenue fund. The state also levies a \$1.75 per ton surcharge that is used in part to fund Ohio EPA – Division of Solid and Infectious Waste activities, including solid waste permit fee activities.

Arkansas

The State of Arkansas levies a series of separate fees for the initial pre-site investigation, initial application, annual fee, modification, permit transfer, and closure (where applicable). In addition to this set of fees, the State levies a \$2.50 per ton surcharge. This surcharge supports some general administrative functions, the statewide recycling and solid waste management grants, the state marketing board for recyclables, and the landfill post-closure trust fund. The permit fees alone do not cover all of the costs associated with the permit processes, however, the Solid Waste Management Division is self-supporting through its various revenue sources. Revenues are collected via the per ton surcharge, waste tire program fees, and solid waste management operator and officer licensure programs.

California

The California Integrated Waste Management Board (CIWMB) is responsible for ensuring that State's waste management policies are primarily carried out through Local Enforcement Agencies (LEA). LEAs have the responsibility for regulating operation and closure of solid waste facilities. LEAs also have responsibilities for guaranteeing the proper storage and transportation of solid wastes.

Solid waste management permit fees are charged by the LEAs. The fees vary between agencies; some fees are determined by staff hours, others use a flat fee. Permits include design, operational, financial, and closure/postclosure requirements. The state uses a 5-tiered permitting structure (see Appendix B) that has been adopted by the CIWMB. The size and type of the facility dictates the specific type of permit that must be obtained. The State also levies a \$1.40 per ton disposal fee. Revenue from per ton disposal fees supports all of the programs at the CIWMB, as well as programs

at the State Water Resources Control Board, which oversees leachate management at the landfills in the state.

Virginia

The State of Virginia levies fees for initial facility permits categorized as Part A and Part B applications. In addition, the state levies a base amendment/modification fee plus fees for specific review activities associated with the amendment/modification by facility type. The permit fees collected are deposited in the Virginia Waste Management Board Permit Program Fund and are used by the Virginia Department of Environmental Quality (VDEQ) to cover a portion of the costs associated with processing permit applications. The revenues from the fees recover approximately 10% of the VDEQ's costs to review applications and the remaining costs are covered through the General Fund.

Florida

The state of Florida levies solid waste permit fees. The fee schedule includes a separate set of fees for construction, operation and closure by facility type. The fee schedule for landfills is divided further into Class I, II, and III landfills which are classified by the quantities and types of materials received. The fees applied to transfer stations, processing facilities, and MRF's are limited to construction and operation review activities.

Florida legislation created a Solid Waste Management Trust Fund in 1988 that utilizes various sources of revenue, beyond the permitting fee revenue. The primary sources of revenue include a waste tire fee, a sales tax collection allowance of 0.2%, and an annual sales tax registration fee from businesses which collect sales tax. The sales tax generated more than \$27 million in 1999. It is our understanding that the various sources of revenues in the Solid Waste Management Trust Fund covers solid waste permitting activities.

New Jersey

The state of New Jersey levies separate annual registration, monitoring, and permit review fees. A revised fee schedule has been proposed by the New Jersey Department of Environmental Protection (DEP) with anticipated adoption in 2003. The annual facility registration fee is the same amount for all applicable solid waste facilities regardless of size or type. The monitoring fees vary based on the facility throughput of the landfill, resource recovery facilities, transfer stations, material recovery facilities, and composting facilities. The permit review fees schedule is comprehensive and the fees are structured based on facility size, type, materials accepted, and review activity. Review activities with specific fees include:

- Completeness determination;
- Engineering design review;
- Permit renewal;

- Major modification;
- Minor modification;
- Transfer of ownership; and
- Minor technical review.

In addition, a separate fee schedule applies to recycling centers. Separate fees are charged to review the initial application for facility operations and an annual/monthly fee is levied on operating recycling centers. Moreover, this schedule has differential rates based on the type of recycling center (i.e. source separated recyclables, used oil, source separated compostables).

The revenues generated through the New Jersey fee schedule exceeded \$47 million in fiscal year 2001. Reportedly, the permit fees have not covered the costs of program permitting and state appropriations have covered the shortfall.

Nebraska

The state of Nebraska requires initial permit application fees for solid waste management facilities. Permits must be renewed every 5 years. The state has specific fees for the initial permit applications, major modifications, and renewals. The state of Nebraska also requires payment of annual operating fees for solid waste facilities. In addition to these fees, the state levies a fee of \$1.25 per ton of MSW disposed. Fifty percent of this revenue generated from the tonnage fee is used for administering the solid waste program, and fifty percent is transferred to the grants program for solid waste and recycling projects. The initial permit application fees, annual operating fees, and disposal fees generate a combined revenue that covers the agency's permitting process costs; presently, no general funds or other sources are used to cover permitting costs.

Illinois

The state of Illinois does not use solid waste permitting fees. However, State Landfill Fees are collected on all landfilled waste. These fees are based on either volume or weight. These fees are used by the Illinois Environmental Protection Agency (IEPA) to provide local grant funding and to conduct household hazardous waste collection and disposal activities. The fees collected do not entirely cover the permit program; the agency relies on the surcharge revenue and the general revenue fund to cover permit program costs. Local governments may impose Local Landfill Fees, patterned after the state fee structure, not exceeding the maximum amounts allowed under the state law. The local government must first adopt an ordinance or resolution to collect the fee, and a copy of the ordinance must be filed with the IEPA prior to the local government collecting the fees.

Findings

Multiple sources of revenue are generally used to support state agency solid waste permitting activities. Of the states surveyed, eight of the twelve indicated the use of permit fees to fund solid waste permit review activities. These states included:

- Arkansas
- Florida
- Missouri
- Nebraska
- New Jersey
- Ohio
- Pennsylvania
- Virginia

The permit fee structures used by these eight states vary considerably. Some of the permit structures include:

- Annual license fees plus permit fees by facility type;
- By activity, including construction, operation, and closure;
- Annual registration and monitoring fees, coupled with individual activity review fees; and
- Initial application fees by facility type and activity review fees.

Five of the eight states with permit fees supplement permit review activities through a per ton disposal fee. These states include:

- Arkansas
- Missouri
- Nebraska
- Ohio
- Pennsylvania

The surcharges vary from \$1.25 up to \$4.00 per ton. Only Nebraska reported that revenue generated through levied permit fees, combined with disposal fees, covers the actual costs of state permitting activities.

Section 3

FULL COST ACCOUNTING ANALYSIS

As part of this study, the project team performed a third party review of the DNR's current costs related to permitting the following types of facilities:

- MSW landfills,
- C&D, CCR and industrial monofills,
- Closed landfills,
- Transfer stations,
- Citizen convenience centers,
- Land application processes,
- Processing facilities,
- Household hazardous waste collection facilities,
- Composting facilities, and
- Appliance demanufacturing centers.

The following discussion summarizes our project team's findings with regard to our analysis of the DNR's actual permitting costs for various permits, as well as the potential permit fees which the DNR may wish to consider assessing for such services.¹

Methodology

In order to conduct a thorough and complete analysis of the DNR's current costs by type of permit, it was essential that the project team gain a thorough understanding of all activities currently conducted within the E&WMB. It was also important that the project team understand how the E&WMB functions within the Environmental Services Division of the DNR. This understanding is critical to ensuring that both the direct costs associated with all permitting activities, as well as all indirect costs (e.g., administration, communications, legal, overhead – rent) are captured during this analysis.

To conduct the necessary analysis, Mr. Yanke of Reed, Stowe & Yanke, LLC (RS&Y) spent two days at the DNR's offices interviewing various staff members of the

¹ At the request of the DNR, the Project Team was instructed that any changes to the State's current tonnage fee must be reasonably "revenue neutral" while considering the annual fluctuation of tonnage fee revenues. Therefore, to the extent that permit fees would recover say \$500,000 per year, the tonnage fee should be reduced by an approximately equal amount.

E&WMB. He also interviewed a number of DNR Field Services personnel via telephone. Prior to visiting with staff, a Request for Information (RFI) was provided to the E&WMB by the project team to obtain as much background information as possible on the DNR's current permitting activities. Documents requested in the RFI included current MSW permitting categories, E&WMB budgets for the past three years, number of permit renewals and amendments processed for the past five years, and relevant statutes and administrative rules.

There were four basic steps, which needed to be completed in order to arrive at a "cost per type of permitting category". The steps were as follows:

1. Identify all direct costs associated with permitting;
2. Identify all indirect costs associated with permitting ;
3. Allocate total permitting costs (direct and indirect) between various permitting categories²; and
4. Identify the number of "activities" per permit category³.

Analysis

Through the course of interviews and a review of various documents, it was found that the majority of costs associated with permitting were located within the E&WMB and Field Services. These costs are detailed on Schedule 1 in Appendix C and total \$1,154,749. However, based on interviews with staff it was also determined that not all of the costs detailed on Schedule 1 were directly associated with the permitting of SDP facilities. For instance, a portion of Comprehensive Planning activities were determined to be permit fee related.

The comprehensive planning activities identified as permit fee related included the following:

- **Tonnage fee reports:** Mailing, tracking, data input and management for all information reported on the fee reports, including determining whether the retained portion of the fees are spent appropriately and the correct fees are paid. Adjustments in fees are also tracked, reported and reconciled.
- **Permitted facility reports:** Mailing, tracking, data input and management for all information reported on the reports.
- **Financial assurance:** Review of information provided as part of the financial assurance submittal. DNR staff input data related to cost estimates and determine whether all requirements outlined in Iowa Administrative Code related to financial assurance have been met.

² Permitting categories are defined as MSW landfills, C&D, CCR & Industrial monofills, closed landfills, transfer stations, citizen convenience centers, land application processes, processing facilities, composting facilities, HHW collection facilities, and appliance demanufacturing centers.

³ Activities are defined as the number of new permits, renewals, and amendments issued by permit category.

- **Authoring permit language on reporting requirements, service area, and comprehensive plan submittals:** DNR staff review draft permits and add or correct information related to reporting requirements, service areas and next plan submittal dates. Service area information was previously submitted separately by applicant. DNR staff now gather this information from comprehensive plans.
- **Database support (facility records, groundwater monitoring database, etc.):** DNR staff design, provide maintenance for and input data into numerous solid waste permitting databases. Currently the primary solid waste database is being redesigned to retain historical data and provide an accurate description of the permitted facility's status. The groundwater monitoring database is being redesigned to enable the user to input data from the web instead of requiring the use of Access. Several new databases have been developed to track financial assurance costs, appliance demanufacturers and special waste authorizations.
- **Miscellaneous administration:** DNR planning staff provide support to the DNR permit writers in a number of ways including:
 - Copying, filing, mailing; record file organization;
 - GIS maps used for a variety of situations; and
 - The continuous process of updating all contact information for permitted facilities including the upkeep of the online permitted facilities directory and the annual report.

In addition, it was determined that approximately 50% of the Field Services' operating costs were directly associated with permitting activities. The remainder of Field Services' costs (or operating budget) were expended dealing with illegal dumping and environmental enforcement activities. Therefore, the costs directly associated with SDP permitting activities for FY 2003 were determined to be \$958,756. In arriving at these costs, historical costs were reviewed to assure that the FY2003 costs were consistent with regard to costs incurred in the previous two fiscal years. It was determined that the FY 2003 costs provide an accurate representation of the actual costs which will be incurred with regard to SDP permitting activities during the current fiscal year. It should be noted that the costs for FY 2003 reflect adjustments for such cost increases as inflation and the increased site visits by permitting staff.

Schedule 3 in Appendix C provides a further breakdown of the costs detailed on Schedules 1 and 2, with a breakout by specific permitting category. These costs were determined based on further interviews with staff and a review of the types of activities permitted during the past five years.

Findings

Schedule 4 in Appendix C provides a summary of the costs by permit category and the number of activities (new permits, renewals, and amendments) that are estimated to be

completed for each type of activity during the upcoming year.⁴ Schedule 5 includes an analysis of the costs associated with the varying levels of effort associated with MSW landfill amendments. Adequate data did not exist to conduct a comparable analysis of other SDP amendments. The bottom line on Schedule 4 “Cost Per Activity” provides an estimate of what the projected cost of service is for each type of permit activity. For instance, it is estimated that the cost of a MSW Landfill Permit Amendment is \$2,497. This reflects the cost of labor, supplies, inspections, office space, etc. for the DNR.

For certain categories, such as “New” permits for MSW landfills, and C&D, CCR & Industrial monofills, there are no costs identified with the permitting of new facilities. This is because there is not a clear estimate as to what the costs would be for such an activity, since these types of permit activities have rarely occurred in the past three to five years. Therefore, there is insufficient historical cost data to determine the cost of permitting a new landfill.

Recommendations

The Project Team would like to make a number of recommendations with regard to the analysis and findings associated with this study. The recommendations are as follows:

1. The “Costs Per Activity” as shown on Schedule 4 in Appendix C are only estimates with regard to the costs incurred by the DNR in permitting various types of solid waste facilities. Therefore these estimates should only be used to provide some guidance with regard to how the DNR wishes to proceed with charging a permit fee for various activities. They should not be considered an “absolute” dollar figure which must be assessed for each type of permitting activity.
2. Any permit fees implemented by the DNR should be consistent with the State of Iowa’s policy with regard to the encouragement of diversion of as much material as possible from landfills. Therefore, permit fees should not be priced at the “actual cost of service” if that cost may potentially prevent individuals, corporations or municipalities from pursuing permits for facilities that would divert waste from landfills. An example of such a permit fee would be for a composting facility. Ultimately, the State will need to balance the establishment of a permit fee that recovers the costs associated with the permitting process (if it is the State’s desire to implement such a fee) and the encouragement of the increased diversion of materials from landfills.
3. The Project Team would recommend that the Iowa DNR track its labor costs with regard to the various permitting categories in the future as detailed on Schedule 4

⁴ It is important to emphasize that this is only an estimate of the number of types of “activities” which may occur during FY 2003, by permitting category. This estimate is based on historical activities, as well as what is expected to happen during the upcoming FY 2003. For instance, there has never been a formal permitting process for “Appliance Demanufacturing.” Therefore, it is estimated that there will be 20 renewals based on the fact that there are approximately 60 of these type facilities and they must have their permits renewed every three years.

in Appendix C. These costs can be monitored by simply having all employees track their time, by type of permit category, as well as the specific permit activity.

Finally, note that the "costs per activity" fees that were calculated (Schedule 4) are fairly consistent, if not lower, than many of the permit fees charged by those states that assess various types of permit fees.⁵

⁵ For specific examples refer to the state survey results in Appendix B.

Section 4

RECOMMENDED PERMIT FEE STRUCTURE

Overview

The objective of this section of the report is to recommend a permit fee structure that reflects the following:

- links actual internal costs of conducting Iowa Department of Natural Resources (DNR) sanitary disposal project (SDP) permit reviews and monitoring with SDP permit fee values;
- draws upon other states' approaches that appear consistent with Iowa solid waste policy, including promoting waste reduction/diversion;
- offers a flexible and workable administrative system that enables the DNR to effectively implement the permit fee structure to meet changing needs; and
- remain revenue neutral.

Permitting Review Costs

A full cost accounting analysis was conducted of the DNR's actual permitting costs for various SDP permits. The analysis was presented to the advisory committee for review and feedback. As a result of the feedback provided, the analysis was refined to more closely link internal costs with specific permitting activities. As identified in Section 3 of the report, the permit related costs for FY 2003 were estimated at \$958,756. Nearly \$600,000 of these costs were attributed to MSW landfill permitting activities and more than \$850,000 of these costs can be attributed to permitting activities associated with all types of landfills. Therefore, other SDP permitting activities represent a minor segment of the overall costs. It should be noted that these results do not include any estimated costs for new permits because inadequate historical data exists to develop estimates.

Based on the above discussion, the recommended permit fee structure needs to include fees that reflect the scope of the DNR permitting activities involved with MSW, Construction and Demolition (C&D), Coal Combustion Reservoir (CCR), Industrial, and Closed Landfills. However, it is likely that activities associated with other types of SDPs will increase into the future. Thus, the recommended permit fee structure needs to include a mechanism to recalibrate the fees on a periodic basis to reflect the actual costs incurred and the scope of the number of activities in a specific permitting area. We recommend evaluation and recalibrating the fee schedule every other year.

Permit Fee Structure

Based upon the results of the survey of select states, as outlined in Section 2, permit fees are frequently used to generate revenues to offset permitting review costs. Of the twelve states surveyed, eight states indicated the use of permit fees to fund solid waste facility permitting review activities. However, five of the eight with permit fees supplemented the costs of permit review activities with a per ton disposal fee. Moreover, as outlined in Section 2, the permit fee structures varied considerably from state to state, but generally offered a differential fee structure with higher fees for disposal facilities as compared to non-disposal solid waste facilities.

Based upon the summary discussion above, we recommend the DNR consider implementation of an SDP permit fee structure as a means to generate revenue to support the on-going statutory responsibility and activities of SDP permit reviews and monitoring. The recommended structure should focus on the permitting activities requiring the most resources to complete. Thus, based upon the present review requirements, the recommended structure should be designed to reflect fees specific to the various landfill permitting activities.

The structures used by various states as related to permitting of MSW landfills included the following:

- Annual license fees based on facility size and type, accompanied by permit fees for new applications and modifications;
- Annual facility registration fees coupled with annual monitoring fees based on facility size and/or type;
- Fees designated solely for specific types of permit reviews such as construction, operation, closure, and subactivities such as review of design plan, groundwater monitoring, etc.; and
- Combinations of the above.

Present Iowa solid waste regulations require MSW landfills to submit permit applications for new facilities, renewals every three years, and for permit amendments. We recommend a permit fee structure that reflects the scope of these activities to allow for the fees to be calibrated to reflect the level of effort associated with each of these activities.

Specifically we recommend a fee structure for MSW, C&D, CCR, and Industrial landfills that includes:

- Initial permit application;
- Annual renewal;
- Major modification/amendment; and
- Minor modification/amendment.

Of those states surveyed, the permit fee structure most similar to the approach recommended above is the fee structure reportedly used by Nebraska. Nebraska requires the following fees:

- Initial permit;
- Major modification;
- Renewal; and
- Annual operating fee.

This structure is applied to all solid waste facility types. Per Nebraska solid waste regulations, solid waste facility permits must be renewed every five years. As referenced above, the project team recommends the use of this type of structure for landfill permitting review activities only.

For the other SDPs, we recommend the following fee structure:

- Initial permit application;
- Renewals; and
- Amendments (when applicable).

We recommend the scope of the fee structure for these facilities differ from landfills because the level of activity associated with permitting and monitoring of these facilities requires a lower level of resources. Specifically, we have excluded differential fees for amendments and monitoring fees. Tracking of the effort involved with monitoring these facilities may be problematic.

Permit Values

The actual values to be associated with the permit fee structure should be set at a level to cover the most, if not all, of the identified permitting and monitoring related costs. The full cost analysis included a "What If" analysis that identified the cost per activity by SDP type. These costs per activity by SDP type are provided below in Table 4-1.

Table 4-1
Permit Fee "What If" Analysis
Cost per Activity (2003\$)

	Annual Cost⁽¹⁾	Amendments
MSW Landfill Permits	4,715	2,497 ⁽²⁾
C&D, CCR & Industrial	4,179	2,774
Closed Landfills	774 ⁽³⁾	-
Transfer Stations	1,043	-
Citizen Convenience Centers	385	-
Land Applications	182	-
Processing Facilities	1,045	1,238
Composting Facilities	1,045	826
HHW Facilities	815	2,282
Appliance Demanufacturing	611	-

Notes:

⁽¹⁾ Reflects one third of the total projected costs for a renewal to represent an annual cost for this activity.

⁽²⁾ Represents average cost for this activity. See Schedule 5 in Appendix C for estimated costs based on varying levels of review effort.

⁽³⁾ Reflects costs associated with annual monitoring, report review and inspection.

None of the above values appear to be excessive as compared to the fees used by other states as reflected in the detailed state survey results in Appendix B. We recommend that the fee schedule be structured to generate revenues equal to the total costs by facility type as identified below in Table 4-2.

Table 4-2
Permit Fee "What If" Analysis
Total Costs by Facility Type (2003\$)

	Totals Costs
MSW Landfill Permits	582,562
C&D, CCR & Industrial	238,983
Closed Landfills	37,151
Transfer Stations	25,038
Citizen Convenience Centers	2,308
Land Applications	4,372
Processing Facilities	8,745
Composting Facilities	8,745
HHW Facilities	14,181
Appliance Demanufacturing	36,670

A fee estimated to cover the costs of an initial application should be estimated internally by the DNR or, as an alternative, a nominal fee should be charged the first year the permit fee program is initiated. The fee can be calibrated in future years based upon actual permitting costs as documented when new applications are reviewed.

For renewals, major modifications, and minor modifications, the fees should be set to generate revenue by facility type equal to the total costs projected to be incurred in FY 2003 as identified above in Table 4-2. Schedule 5 in Appendix C attempts to break the amendment costs down into levels of effort – high, medium, and low. We recommend the fees for major modifications/amendments and minor modifications/amendments be set at the same level the first year of implementation because of limited historical data. The total revenue generated should be equal to amendment costs projected for FY 2003. These fees should be recalibrated after the first year upon tracking review time as related to varying level of review associated with amendments.

For permit renewals, we recommend the fees be set to recover projected renewal costs by facility type. However, for monitoring fees, we recommend a nominal fee be established the first year. Costs should be monitored in subsequent years to recalibrate monitoring fees for landfills to better represent actual facility monitoring costs.

Revenue Neutral

It is the intent of the DNR to consider initial implementation of a permit fee structure that is "revenue neutral". Therefore, the new revenues via the permit fee structure would be offset by an equivalent reduction in revenue from the solid waste tonnage fee. Presently, the Iowa solid waste tonnage fee generates revenues used to cover the costs to permit and monitor SDPs. Therefore, assuming the permit fee structure generates at least \$958,756 in FY 2003, the solid waste tonnage fee would be reduced by approximately \$.38 per ton.

Appendix A

State Survey

Solid Waste Management Permit Fee and Funding Structure Survey

State Agency: _____

Address: _____

City, State and Zip Code: _____

Contact Name: _____

Phone Number: _____

Fax Number: _____

E-mail Address: _____

Please provide the following information regarding solid waste permit fee and funding structures in your state.

1. Please list the types of solid waste management facilities in your state that require a permit.

2. Please provide a rate schedule that pertains to permit fees associated with solid waste management facilities (i.e., landfills, waste-to-energy facilities, composting facilities, HHW facilities, etc.). These could be annual fees that are charged to facility owners and/or operators and initial permitting fees charged to new facilities.

3. Has the solid waste permit rate schedule changed in the last 2-3 years? If so, please identify the fees (and corresponding facility type) and their changes.

4. Please provide the estimated revenues generated via the solid waste permit fees for each of the last two to three years (by type of permit fee).
5. Are there other sources of revenue (i.e. taxes or landfill surcharges) that are used to support the agency's costs associated with the permitting process? (If so, what is the surcharge amount per ton or the tax percentage?)
6. Overall, do the permit fees cover the agency's permitting process costs? Do other revenue sources cover the costs?
7. Are there any other revenue sources that support solid waste programs or activities? If so, to what extent do they subsidize the programs?
8. Does your state measure statewide diversion rates? If so, how do you measure diversion? Please provide the statewide diversion rate for each of the last three years.

9. Please provide a copy of state statutes and administrative rules that provide the authority to create solid waste permit fee requirements, or provide access via an electronic version or Internet site.

10. Does the revenue received from permit fees go into the State's general fund, solid waste fund, or other?

11. Please explain the process of assigning the values for the various permit fees or taxes (i.e. fees are based on the level of effort to process).

Thank you for answering these questions. Please fax completed survey to Mary Chamberlain at R. W. Beck at (651) 994-8396. Any questions can be directed to Mary at (651) 994-8415.

Appendix B

State Survey Results

Iowa Department of Natural Resources Analysis of Model Permit Fee Structures

TABLE 1	State					
	Iowa IA Department of Natural Resources (DNR)	Minnesota MN Pollution Control Agency (MPCA)	Ohio OH Environmental Protection Agency (Ohio EPA)	Florida FL Dept. of Environmental Protection (DEP)	New Jersey NJ Dept. of Environmental Protection (DEP)	California CA Integrated Waste Management Board (CIWMB)
1. List the types of SW Mgmt facilities that require a permit.	<ul style="list-style-type: none"> ▪ Municipal Solid Waste Landfills ▪ Non-Municipal Solid Waste Landfills ▪ Incinerators ▪ Land Application Disposal ▪ Waste Transfer Stations ▪ Composting Facilities ▪ Recycling/Recovery Facilities ▪ Medical Waste Transfer Stations ▪ Waste Storage Facilities ▪ Waste Processing Facilities ▪ HHW Facilities ▪ C&D Facilities 	<ul style="list-style-type: none"> ▪ Land Disposal of: <ul style="list-style-type: none"> Mixed Municipal MSW Demolition Debris Industrial Solid Waste MSW Combustor Ash ▪ SW Transfer Stations ▪ SW Compost Facilities ▪ SW Recycling Facilities ▪ SW Processing Facilities (prior to mass burn) ▪ SW Storage Facilities ▪ Refuse-Derived Fuel Processing Facilities 	<ul style="list-style-type: none"> ▪ Landfills ▪ Incinerators ▪ Transfer Stations ▪ MSW Composting Facilities ▪ Scrap Tire Recovery Facilities ▪ Scrap Tire Monofill or Monocell Facilities 	<ul style="list-style-type: none"> ▪ MSW Landfills ▪ WTE Facilities ▪ Incinerators ▪ Waste Processing Facilities, including Transfer Stations and MRFs ▪ Manure & Yard Waste Composting Facilities ▪ Solid Waste Composting Facilities ▪ Waste Tire Processing Facilities ▪ C&D Disposal Facilities 	<ul style="list-style-type: none"> ▪ Class I Sanitary Landfills (municipal, nonhazardous SW) ▪ Class II Sanitary Landfills (industrial waste) ▪ Class III Sanitary Landfills (inert, nonputrescible, nonhazardous SW) ▪ Transfer Stations & MRFs ▪ Incinerators ▪ Class B Recycling Center (source separated, non-putrescible waste concrete, brick, wood waste, tires, tree trunks, stumps, brush etc.) ▪ Class C Recycling Center (compostable food waste, vegetative waste, & yard trimmings) ▪ Class D Recycling Center (used oil and universal waste) <p>(Permits are not required for Class A Recycling Centers – metal, glass, paper, plastic and OCC)</p>	<ul style="list-style-type: none"> ▪ Landfills ▪ Transfer/Processing Facilities ▪ Compost Facilities ▪ Petroleum Contaminated Soil Disposal ▪ Ash Disposal ▪ Tire Storage ▪ Transformation (incineration)
2. Rate Schedule, including initial fee and renewal fee for:	<p>Iowa does not charge fees for permits.</p> <p>However, per the Project Team's full cost accounting analysis, estimated "costs per activity" have been developed. These estimates are provided below for reference only.</p>	<p>Minnesota does not charge fees for permits. The MPCA will expedite a permit review for a fee, to cover the costs of staff overtime or consultant services needed. Fee must be paid prior to review initiation.</p>	<p>Two sets of fees are listed below:</p> <ul style="list-style-type: none"> ▪ Annual license fees, which require a \$100 non-refundable license application fee. This fee will be deducted from the license fee upon issuance of the license. ▪ Permit fees, which require a \$400 non-refundable application fee. Fee will be deducted from the permit fee upon issuance. 	<p>The rates below list the permit fees for:</p> <p>Construction/Operation/Closure</p> <p>The fees vary by individual activity.</p>	<p>Each Solid Waste facility permittee shall pay an annual facility registration update fee of \$1,010 as well as an annual monitoring fee listed below.</p> <p>Also, a comprehensive activity review fee is required. (See attached "New Jersey Statutory Excerpt".</p>	<p>Fees are charged by Local Enforcement Agencies.</p> <p>Permits include design, operational, financial, and closure/postclosure requirements.</p> <p>The fee rate varies per Local Enforcement Agency.</p>

TABLE 1	State					
	Iowa IA Department of Natural Resources (DNR)	Minnesota MN Pollution Control Agency (MPCA)	Ohio OH Environmental Protection Agency (Ohio EPA)	Florida FL Dept. of Environmental Protection (DEP)	New Jersey NJ Dept. of Environmental Protection (DEP)	California CA Integrated Waste Management Board (CIWMB)
Landfills	Renewal: \$14,144 Amendment: \$2,497	n/a	License Fees: 100 TPD or less: \$ 5,000 101-200 TPD: \$12,500 201-500 TPD: \$30,000 501 TPD or more: \$60,000 Permit Fees: New Facility and Modification of Facility w/ capacity increase: \$10/1,000 cy ³ min \$1,000, max \$80,000. Modification of Facility w/o capacity increase: \$1,000	Class I, 20 tons or more/day: \$10,000/\$10,000/\$7,500 Class II, less than 20 tons/day: \$10,000/\$10,000/\$7,500 Class III, landfills that receive only yard waste, C&D, tires, appliances, or other non-putrescible household waste: \$6,000/\$4,000/\$4,000	Class I, II, & III Sanitary Landfills Facility Registration Fee: \$1,010 Annual Monitoring Fee: 31,200 TPY or more: \$22,988 Less than 31,200 TPY: \$ 6,386 Activity Review Fee: See attached "New Jersey Statutory Excerpt".	CA has a 5-tiered permitting structure. See attached "California Tiered Permits" for details.
C&D Landfill	Renewal: \$12,536 Amendment: \$2,774	n/a	License Fees: \$3,000 Permit Fees: \$0	\$2,500/\$2,500/\$2,500	Class III Sanitary Landfill Facility Registration Fee: \$1,010 Annual Monitoring Fee: 31,200 TPY or more: \$22,988 Less than 31,200 TPY: \$ 6,386	
Resource Recovery Facilities or Incinerators	n/a	n/a	License Fees: 100 TPD or less: \$ 2,500 101-200 TPD: \$ 6,250 201-500 TPD: \$15,000 501 TPD or more: \$30,000 Permit Fees: \$1,000 for New Facility and Modification to Facility	WTE facilities not covered by the FL Electrical Power Plant Siting Act \$10,000/\$10,000/\$1,000 Other resource recovery facilities \$2,000/\$1,000/\$1,000 Incinerators \$3,000/1,000/\$1,000	Thermal Destruction Facilities Facility Registration Fee: \$1,010 Annual Monitoring Fee: 9.6 TPD or more: \$21,072 Less than 9.6 TPD: \$ 1,834 Activity Review Fee: See attached "New Jersey Statutory Excerpt".	
Transfer Stations	Renewal: \$3,130	n/a	License Fees: \$750 Permit Fees: \$2,500	\$2,000/\$1,000/ no closure fee	Facility Registration Fee: \$1,010 Annual Monitoring Fee: 31,200 TPY or more: \$16,946 Less than 31,200 TPY: \$5,894 Activity Review Fee: See attached "New Jersey Statutory Excerpt".	
Solid Waste Processing Facilities	Renewal: \$3,134 Amendment: \$1,238	n/a	n/a	\$2,000/\$1,000/ no closure fee		
Materials Recovery Facilities	n/a	n/a	n/a	\$2,000/\$1,000/ no closure fee	Class B Recycling Center General Operation Fee: Application Fee: \$5,892 Annual Fee: \$6,067	

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Composting Facilities	Renewal: \$3,134 Amendment: \$826	n/a	License Fees: 12 TPD or less: \$ 300 13-25 TPD: \$ 600 26-50 TPD: \$ 1,200 51-75 TPD: \$ 1,800 76-100 TPD: \$ 2,500 101-200 TPD: \$ 6,250 201-500 TPD: \$15,000 501 TPD or more: \$30,000 Permit Fees: \$1,000 for New Facility and Modification to Facility	Yard Waste or Manure: \$2,000/\$1,000/\$1,000 Solid Waste Composting: \$5,000/\$3,000/\$1,000	Class C Recycling Center General Operation Fee: Application Fee: \$5,976 Annual Fee: \$3,763	
HHW Facilities	Renewal: \$2,455 Amendment: \$2,282	(No permit fee required, but an official notice is required.)	n/a	No Solid Waste permit required for HHW facilities, but voluntary Best Management Practices, similar to TSD requirements, are encouraged and followed by the majority of sites. The need for possible permitting is under discussion.	n/a	
Others:	Closed Landfill: \$774 Citizen Convenience Center Renewal: \$1,154 Land Application Renewal: \$547 Appliance Remanufacturing Renewal: \$1,834	n/a	Infectious Waste Treatment Facilities License Fees: 100 TPD or less: \$ 5,000 101-200 TPD: \$12,500 201-500 TPD: \$30,000 501 TPD or more: \$60,000 Permit Fees: New Facility: \$10/1,000 cy ³ min \$1,000, max \$80,000 Modification of Facility w/ capacity increase: \$10/1,000 cy ³ min \$1,000, max \$80,000 Modification of Facility w/o capacity increase: \$1,000 Infectious Waste Incinerators License Fees: One half the amount for infectious waste treatment facilities. Permit Fees: \$1,000	Waste Tire Processing Facility: \$1,250/\$500/\$1,000 Offsite biomedical waste treatment facility other than a biomedical waste incinerator: \$2,000/\$1,000/\$1,000 Additional fees are listed for other misc. review activities.	Intermodal Container Facilities (a facility where containerized solid waste is transferred from one mode of transportation, such as trucks, rail cars, ships and barges, to another, or from one vehicle to another within one mode of transportation) Facility Registration Fee: \$1,010 Annual Monitoring Fee: \$ 260 Class D Recycling Center (used oil) General Operation Fee: Application Fee: \$13,367 Annual Fee: \$8,005	

TABLE 1	State					
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3. Has the permit rate schedule changed in the last 2-3 years? If so, please identify the fees.	n/a	n/a	No.	No significant changes.	Unchanged since 1996. Revised fees presently under development – proposed for publication on 12/02/02 in NJ Register and target date of 6/05/03 for adoption.	n/a
4. Estimated revenue generated via the SW permit fees for last 2-3 yrs.	n/a	MN has no permit fees. Revenue generated via the Solid Waste Tax (see #5): FY 1999: \$49 million FY 2000: \$54.3 million FY 2001: \$54.5 million FY 2002: \$55.4 million (est.) Revenue generated via the Metropolitan Landfill Fee in FY 2001: \$4.7 million	Revenue from SW Permit Fees: 1999 New Facilities: \$7,500 Expansions: \$201,520 AMDWR Change ¹ : \$4,000 Other Modifications: \$2,000 2000 New: \$0 Expansions: \$256,484 AMDWR: \$2,000 Other: \$0 2001 New: \$29,428 Expansions: \$85,393 AMDWR: \$9,000 Other: \$1,000	Permit Fees received from solid waste construction, operation, and closure permit applications in FY 2001 and FY 2002: FY 2001: Construction: \$91,783 Operation: \$190,834 Closure: \$38,933 FY 2002: Construction: \$100,950 Operation: \$246,450 Closure: \$55,850	2000: \$7,983,050 2001: \$8,272,505 2002 (est.): \$4,786,018	n/a
5. Are there other sources of revenue (taxes or surcharges) used to support the agency's permitting costs? If so, what is the amount?	IA has a tonnage fee paid on each ton of MSW landfilled in Iowa. The base fee is \$4.25 per ton. Penalties and rewards for waste diversion efforts, may increase or decrease the fee as follows: ▪ Planning areas with less than 25% diversion level: Collect: \$4.75 Remit to DNR: \$3.30 Retain: \$1.45 ▪ Planning areas over 25% diversion, under state average, &	MN has a Solid Waste Tax. The tax is paid by residential and commercial generators of solid waste. The tax is usually collected by the waste hauler (via the generator's garbage bill) or at the disposal site (for self-hauls). The tax is remitted to the MN Dept. of Revenue. Rates: Mixed Residential Generators, 9.75% of collection & tipping cost Mixed Commercial generators, 17% of collection & tipping cost Nonmixed MSW rates: \$2.00/ton for C&D \$.60/c.y. for industrial waste \$.60/c.y. for infectious waste	OH has a \$1.75/ton total disposal fee. \$.75 of this fee is used to fund OH EPA-Division of Solid & Infectious Waste, while the remaining \$1.00 is used to fund OH EPA-Division of Hazardous Waste and OH EPA-Division of Emergency & Remedial Response equally.	The FL Legislature created the Solid Waste Mgmt. Trust Fund in 1988 to fund the solid waste activities of the DEP, provide grants & awards to local gov'ts, provide funds for demonstration projects, & provide funding for research. The Dept. of Revenue collects revenues deposited in the fund from numerous sources, including the waste tire fee, a sales tax collection allowance of 0.2%, and an annual sales tax registration fee from businesses which collect sales tax. Between 1989 and 1999, the SW Mgmt. Trust Fund received revenue from the following sources (the largest generator is the .2%	Presently there are no other revenue sources for solid waste permitting. The DEP is currently drafting a recommendation to the commissioner to revise the fee structure to include a dollar per ton fee to help fund the solid waste program. If the commissioner approves the plan, then it will go to the state legislature.	CA has a \$1.40 per ton disposal fee. This money supports all of the programs at the CIWMB as well as programs at the State Water Resources Control Board.

¹ AMDWR – Authorized Maximum Daily Waste Receipt
1/16/2003

TABLE 1	State					
	Iowa IA Department of Natural Resources (DNR)	Minnesota MN Pollution Control Agency (MPCA)	Ohio OH Environmental Protection Agency (Ohio EPA)	Florida FL Dept. of Environmental Protection (DEP)	New Jersey NJ Dept. of Environmental Protection (DEP)	California CA Integrated Waste Management Board (CIWMB)
	under 50%: Collect: \$3.65 Remit to DNR: \$2.20 Retain: \$1.45 ▪ Planning areas over 25% diversion, over state average, & under 50%: Collect: \$3.65 Remit to DNR: \$2.10 Retain: \$1.55 ▪ Planning areas over 25% diversion, over state average, & over 50%: Collect: \$3.25 Remit to DNR: \$1.95 Retain: \$1.30	Exemptions: ▪ Counties fees or surcharges. ▪ Mixed & nonmixed MSW generated outside of MN. ▪ Recyclable materials. ▪ Industrial waste when it is transported to a facility owned & operated by the same person that generated it. ▪ Mixed MSW from a recycling facility that separated or processes recyclable materials & reduces the volume of waste by at least 85%. ▪ Source-separated compostable waste. ▪ Daily cover for landfills that has been approved by the MPCA. ▪ Construction debris in a presidentially declared disaster area. MN also has a Metropolitan Landfill Fee collected only on garbage deposited at metro- area (Mpls.-St.Paul) landfills. Rate is \$2/c.y. on MSW.		sales tax): ▪ Waste Tire Fee \$140 million (FY99 \$18.3 million) ▪ .2% Sales Tax: \$192 million (FY99 \$27.6 million) ▪ Business Reg. Fee: \$66 million (FY99 \$4.9 million)		
6. Do the permit fees cover the permit process costs? Do other revenue sources cover the costs?		Because the revenue is dependent on the amount of waste generated, it varies. (See question #10 regarding funding shortfalls.)	No, because the permit fees do not go to the solid waste program. Part of the permit fees are used to support local health department solid waste activities and/or go into the general revenue fund. The license fee is sufficient for some of the health departments, but not others.		Permit fees have historically fallen short of program costs. State appropriations have made up the difference.	The disposal fee covers all of the CIWMB's permitting costs as well as all of the other programs.

TABLE 1	State					
	Iowa IA Department of Natural Resources (DNR)	Minnesota MN Pollution Control Agency (MPCA)	Ohio OH Environmental Protection Agency (Ohio EPA)	Florida FL Dept. of Environmental Protection (DEP)	New Jersey NJ Dept. of Environmental Protection (DEP)	California CA Integrated Waste Management Board (CIWMB)
7. Are there any other revenue sources that support SW programs or activities? If so, to what extent do they subsidize?	See question #5		Construction and demolition debris (C&DD) is not defined as a SW, however this program is subsidized by the SW disposal fee. Infectious waste only meets the definition of a SW if it is treated, however, it is subsidized by the SW disposal fee. OH EPA's Div. of Solid & Infectious Mgmt. includes a Planning Unit. This unit works to ensure that the SW mgmt. districts are meeting state goals. OH has rules that allow these districts to levy fees on the disposal of waste to fund their strategies and programs to meet state goals.		Although there are other revenue sources to support other solid waste program areas (regulated medical waste, non-permitted recycling, economic regulation), these sources do not subsidize the solid waste permitting program area.	There are special fees for tires and used oil that support programs in those areas.
8. Statewide diversion rate for the last 3 years. (And how it is calculated.)	33.5% reduction in landfilled waste in 1995, 35% in 2000	Statewide recycling rates: 1998: 46% 1999: 47.2% 2000: 47.8%	OH EPA calculates a recycling rate by dividing the total amount of MSW recycled in a given year by the total amount of MSW generated, where the amount of MSW generated equals the amount of recycled MSW plus the amount of MSW disposed. 1998: 39.02% 1999: 38.88% 2000: 42.67%	1998 MSW Recycling Rate: 28% The Legislature established a goal of 30% by the end of 1994 for each county with a population over 75,000.	Statewide Recycling Rates: 1998: 40% 1999: 39% 2000: 38%	CA has a 50% waste diversion law. Jurisdictions that did not meet the 50 percent diversion requirement in 2000 may petition the Board for one or more time extensions, but not beyond January 1, 2006. Out of 445 reporting jurisdictions, 195 have met or exceeded the 50% diversion rate. 2000 diversion rates are reported by jurisdiction and vary from 28% to 92%
9. Enabling legislation to create SW permit fee requirements.	Iowa Administrative Code, Title XI	Solid Waste Management Taxes are detailed in MN State Statutes 2001, Chapter 297H.	Ohio Revised Code 3745.11 (Q)	FL Statutes, Chapter 403, Part IV, ss. 403.702-403.7895 FL Administrative Code, Chapters 62-701	Solid Waste Management Act, N.J.S.A. 7:1E – 1 et seq.	Title 14 and 27, CA Code of Regulations

TABLE 1	State					
	Iowa IA Department of Natural Resources (DNR)	Minnesota MN Pollution Control Agency (MPCA)	Ohio OH Environmental Protection Agency (Ohio EPA)	Florida FL Dept. of Environmental Protection (DEP)	New Jersey NJ Dept. of Environmental Protection (DEP)	California CA Integrated Waste Management Board (CIWMB)
10. Revenue from permit fees goes into what type of fund? (General, SW, etc.)	Tonnage Fees remitted to the DNR are placed in the Solid Waste account of the Groundwater Protection Fund for DNR operations and statewide program support.	Allocation of revenues: \$22 million or 50%, whichever is greater, of the amounts remitted must be credited to the SW fund. The remainder is deposited into the general fund. If less than \$22 million is projected to be available, the commissioner of revenue shall increase the tax proportionately.	Solid waste facility permit fees are credited to the State General Revenue Fund (GRF). The revenue from annual license fees are divided between the approved Board of Health or GRF. Landfills, Incinerators, Composting Facilities: Board of Health retains \$2,500 (or the entire amount if less than \$2,500) & the remainder goes to GRF. Transfer Stations: Board of Health retains the entire amount. Infectious Waste Treatment and Infect. Waste Incinerators: Board of Health retains \$2,500 (or the entire amount if less than \$2,500) of the fee & the remainder goes to GRF. C&DD Facilities: If license is issued by Board of Health, then half of the fee is retained by the Board, with the remainder being credited to the C&DD facility oversight fund. If the license is issued by OH EPA, the entire amount is credited to the C&DD facility oversight fund.	Permit Fee Trust Fund and Solid Waste Management Trust Fund.	All fee revenues go into the General Fund.	n/a
11. Explanation for the process of assigning the values for the various permit fees or taxes (i.e. fees are based on the level of effort to process).		The SW Mgmt. Tax rate was calculated to roughly equal the tax burden from two previous revenue measures scheduled for replacement: a 6.5% sales tax on garbage collection services and a Solid Waste Generator Assessment. The 6.5% tax paid for county recycling programs; and the SWGA paid for MPCA	Fees are set by the State Legislature.	The maximum allowed under state statute at the time the permit fees were developed was \$10,000 (approx. 10 years ago) so that was applied to the Class I and II MSW landfills. The remainder of the facility fee structure was based on a common sense approach and several factors including, but not limited to, the complexity of design for each class type, the anticipated	The fees are derived from the average processing time for each activity (excluding the outliers) multiplied by the average hourly cost. Processing time is measured using facility-specific job codes and activity codes per staff timesheets.	The Local Enforcement Agencies use various formulae to determine the fees. Some are a set amount and some charge a per hour rate.

TABLE 1	State					
	Iowa IA Department of Natural Resources (DNR)	Minnesota MN Pollution Control Agency (MPCA)	Ohio OH Environmental Protection Agency (Ohio EPA)	Florida FL Dept. of Environmental Protection (DEP)	New Jersey NJ Dept. of Environmental Protection (DEP)	California CA Integrated Waste Management Board (CIWMB)
		groundwater and solid waste programs, chiefly the Closed Landfill Program. These were repealed and folded into the new Solid Waste Management Tax. So the SW Mgmt. Tax now pays for the MPCA's oversight of permitted solid waste facilities as well as larger responsibilities.		degree of involvement during the review and permitting process, and the potential for harm to the environment and public health.		

Iowa Department of Natural Resources Analysis of Model Permit Fee Structures

TABLE 2	State				
	Texas TX Commission on Environmental Quality (TCEQ)	Missouri MO Dept. of Natural Resources (DNR)	Virginia VA Dept. of Environmental Quality (DEQ)	Arkansas AR Dept. of Environmental Quality (DEQ)	Pennsylvania PA Dept. of Environmental Protection (DEP)
1. List the types of SW Mgmt facilities that require a permit.	<ul style="list-style-type: none"> MSW Landfills C&D Landfills Solid Waste Processing Facilities (i.e. incineration, composting, shredding) Some transfer stations are permitted, some only require registration. Some MRFs are permitted, some only require registration. 	Disposal Facilities including: <ul style="list-style-type: none"> MSW Landfills C&D Landfills Special Waste and Utility Waste Landfills Processing Facilities including: <ul style="list-style-type: none"> Incinerators Transfer Stations MRFs Resource Recovery Facilities Infectious Waste Processing Facilities MSW and/or sewage sludge composting facilities 	<ul style="list-style-type: none"> MSW Landfills Industrial Landfills C&D Landfills Material Recovery Facilities Incinerators Transfer Stations Composting Facilities Waste-to-Energy Facilities 	Permit classifications include: <ul style="list-style-type: none"> Class 1 MSW Landfill Class 3 MSW Landfill (for waste generated solely by the permittee at that industry location) Class 4 C&D Landfill Composting Facilities Transfer Stations Waste Recovery Facilities 	<ul style="list-style-type: none"> MSW Landfill C&D Disposal Facility Transfer Station Composting Facility for MSW or Sewage Sludge Resource Recovery Facility or Incinerator MSW Processing Facility Demonstration Projects for Processing or Disposal Facilities based on new or unique technology MSW reuse
2. Rate Schedule, including initial fee and renewal fee for:	No initial permitting fee or annual renewal fee.	Permit fees are applicable for the life of the facility and there are no annual renewal fees. The costs for the review process are based on staff hours for review times the hourly rate. Therefore, there is no fee matrix available to itemize costs associated with the permit review process.	Fees are for the initial issuance or modification of permits. Most applications for a new facility are subject to Part A and Part B application fee. The part A fee covers site suitability and geology issues while Part B covers design issues. Amendments or modifications to the permit have separate fees associated with each type of Module. Module 1 (General): \$900 This fee is for the staff's description or write-up of the permit modification and is charged for most major modifications to a permit. Module 2 (Facility): \$3,000 This fee is for an alteration to the landfill/facility operations. This fee only applies if there are	The initial permit application fee for a solid waste permit is composed of two parts, (1) the pre-site investigation fee, and (2) the initial permit application fee. The nonrefundable pre-site investigation fee will help to recover the costs of the preliminary engineering site survey conducted by the various regulating agencies in association with this Dept. The initial permit application fees are applicable to all types of facilities permitted under the Solid Waste Management Act. Minor modifications include changes involving paperwork, such as name changes. Major modifications are more substantial and involve engineering or the addition of a cell or acreage.	Initial Fee/Permit Modification Fee

TABLE 2	State				
	Texas TX Commission on Environmental Quality (TCEQ)	Missouri MO Dept. of Natural Resources (DNR)	Virginia VA Dept. of Environmental Quality (DEQ)	Arkansas AR Dept. of Environmental Quality (DEQ)	Pennsylvania PA Dept. of Environmental Protection (DEP)
			modifications to the existing operations. Module 3,4 and 5 (Landfill): \$16,200 This fee applies if there is a major alteration to the design of the landfill that was not a part of the original permit, such as new cell additions. Module 6 (Compost Facility): \$8,400 This fee applies if there is a major alteration to the design of the facility that was not a part of the original permit. Module 7 (Transfer Station): \$2,700 This fee applies if there is a major alteration to the design of the facility that was not a part of the original permit. Module 8 (Material Recovery Facility): \$3,600 This fee applies if there is a major alteration to the design of the facility that was not a part of the original permit. Module 9 (Incinerator/energy recovery): \$6,900 This fee applies if there is a major alteration to the design of the facility that was not a part of the original permit. Module 10 or 11 (Groundwater monitoring): \$7,500 Module 12 or 13 (Closure or Post- Closure): \$ 900 Public Participation: \$2,400 Minor amendment or modification: \$900		

TABLE 2	State				
	Texas TX Commission on Environmental Quality (TCEQ)	Missouri MO Dept. of Natural Resources (DNR)	Virginia VA Dept. of Environmental Quality (DEQ)	Arkansas AR Dept. of Environmental Quality (DEQ)	Pennsylvania PA Dept. of Environmental Protection (DEP)
Landfills	n/a	Application fee: \$2,000 Review Costs: up to \$8,000	Term: Indefinite Part A Application: \$9,600 Part B Application: \$42,900 Amendment/Modification: Module 3, 4 or 5: \$16,200 Or... Design plan: \$2,100 Liner design: \$4,500 Leachate system: \$3,000 Drainage plan: \$2,100 Cover design: \$4,200 Groundwater monitoring: Module 10 or 11: \$7,500 Or... Well placement: \$3,000 Well Material and specifications: \$900 Well Sampling plan: \$3,600 Closure (Module 12): \$900 Post-Closure (Module 13): \$900 Public Participation: \$2,400 Minor amendment or modification: \$900	Class 1 Landfill Pre-Site \$2,000 Application \$10,000 Annual \$6,000 Modification \$4,000 (major) or \$3,000 (minor) Permit Transfer \$1,000 Post-Closure \$500 Class 3 Landfill Pre-Site: \$2,000 Application: \$10,000 (commercial) or \$5,000 (non-commercial) Annual: \$5,000 (commercial) or \$3,000 (non-commercial) Modification \$2,000 (major or minor) Permit Transfer \$1,000 Post-Closure \$500	\$18,500/\$7,800
C&D Landfill	n/a	Application fee: \$2,000 Review Costs: up to \$8,000	Same fees as Landfills, as stated above.	Pre-Site \$1,000 Application \$1,000 Annual \$500 Modification \$1,000 (major or minor) Permit Transfer \$1,000 Post-Closure \$500	\$19,250/\$7,800

TABLE 2	State				
	Texas TX Commission on Environmental Quality (TCEQ)	Missouri MO Dept. of Natural Resources (DNR)	Virginia VA Dept. of Environmental Quality (DEQ)	Arkansas AR Dept. of Environmental Quality (DEQ)	Pennsylvania PA Dept. of Environmental Protection (DEP)
Resource Recovery Facilities or Incinerators	n/a	Application fee: \$1,000 Review costs: up to \$4,000	Term: Indefinite Full permit: \$13,500 Amend/Modification: Module 9: \$6,900 Or... Waste residue/storage: \$2,100 Operational Reqs: \$3,600 Waste control procedures: \$1,200 Closure Plan (Module 12): \$900 Public Participation: \$2,400 Minor amendment or modification: \$900	n/a	\$1,900/\$1,500
Transfer Stations	n/a	Application fee: \$1,000 Review costs: up to \$4,000	Term: Indefinite Full permit: \$9,900 Amend/Modification: Module 7: \$ 2,700 Closure (Module 12): \$900 Public Participation: \$2,400 Minor amendment or modification: \$900	Pre-Site \$450 Application \$450 Annual \$450 Modification \$450 (major or minor) Permit Transfer \$450 Post-Closure \$500	\$4,400/\$700
Solid Waste Processing Facilities	n/a	n/a	n/a	n/a	\$4,000/\$700 [may apply to MRFs]
Materials Recovery Facilities	n/a	Application fee: \$1,000 Review costs: up to \$4,000	Term: Indefinite Full permit: \$9,900 Amend/Modification: Module 8: \$3,600 Or... Waste supply analysis: \$1,500 Waste management areas: \$1,200 Wastewater management areas: \$900 Closure Plan (Module 12): \$900 Public Participation: \$2,400 Minor amendment or modification: \$900	Pre-Site \$450 Application \$450 Annual \$450 Modification \$450 (major or minor) Permit Transfer \$450 Post-Closure \$500	

TABLE 2	State				
	Texas TX Commission on Environmental Quality (TCEQ)	Missouri MO Dept. of Natural Resources (DNR)	Virginia VA Dept. of Environmental Quality (DEQ)	Arkansas AR Dept. of Environmental Quality (DEQ)	Pennsylvania PA Dept. of Environmental Protection (DEP)
Composting Facilities	n/a	Application fee: \$1,000 Review costs: up to \$4,000	Term: Indefinite Part A Application: \$4,800 Part B Application: \$24,300 Amend/Modification: Module 6: \$8,400 Or... Design plan: \$1,500 Liner Design: \$3,000 Leachate System: \$2,100 Drainage plan: \$ 1,500 Closure (Module 12): \$900 Public Participation: \$2,400 Minor amendment or modification: \$900	Pre-Site \$450 Application \$450 Annual \$450 Modification \$450 (major or minor) Permit Transfer \$450 Post-Closure \$500	
HHW Facilities	n/a	n/a	Although some material recovery facilities and locally operated waste drop-off centers may collect household hazardous waste, fees are not assessed for the permitting of household hazardous waste collection centers.	n/a	

TABLE 2	State				
	Texas TX Commission on Environmental Quality (TCEQ)	Missouri MO Dept. of Natural Resources (DNR)	Virginia VA Dept. of Environmental Quality (DEQ)	Arkansas AR Dept. of Environmental Quality (DEQ)	Pennsylvania PA Dept. of Environmental Protection (DEP)
Others:	n/a		<p>Solid Waste Experimental Facility Permit: For a facility who proposes to use innovative or experimental treatment technologies or processes for which standards have not been promulgated. Term is for 1 year (renewable for up to 3 years). Fee \$4,800</p> <p>Amendments/Modifications: Module 1 (General): \$900 Module 2 (Facility): \$3,000</p> <p>Groundwater monitoring: Module 10 or 11: \$7,500 Or... Well placement: \$3,000 Well Material and specifications: \$900 Well Sampling plan: \$3,600</p> <p>Closure (Module 12) : \$900 Post-Closure (Module 13): \$900 Public Participation: \$2,400 Minor amendment or modification: \$900</p>	n/a	<p>\$17,300/\$6,700 Demonstration Facilities \$1,200/\$400 Agricultural Utilization of Sewage Sludge \$4,000/\$1,100 Land Reclamation of Sewage Sludge \$300 Minor permit modifications, Permit Reissuance, and Permit Renewal. \$300 for the addition of types of waste not approved in the permit.</p>
3. Has the permit rate schedule changed in the last 2-3 years? If so, please identify the fees.	No changes	No changes	<p>July 1, 2002 legislation authorized the Department to implement emergency regulations to triple permit fees. Fees for modifications were also adjusted accordingly. Prior to July 1, 2002, the fees for new facilities were as follows:</p> <p>Landfills: (Part A : \$3,200) and (Part B: \$14,300) Incineration: \$4,500 Transfer Station/MRF: \$3,300 Compost Facility: (Part A: \$1,600) and (Part B: \$8,100)</p> <p>The same proportional adjustments were made to the fees associated with amendments/modifications.</p>	Increased in 2000 by approximately 10% across the board. Previous years data not available. This was not through a Legislative action, but was performed through the current regulatory process. However, this increase represents the last allowable increase in the fees under the current regulations. Therefore, the method for determining the allowable fees is proposed to be simplified during the 2003 legislative session.	<p>1999: Initial/Modification \$11,400/\$4,600 MSW Landfill \$6,000/\$4,600 C&D Landfill \$1,200/\$400 Ag. Utilization of Sewage Sludge \$4,000/\$1,100 Sewage Sludge for Land Reclamation \$1,400/\$400 Transfer Station \$3,000/\$900 Resource Recovery/Incinerators \$2,000/\$400 MSW Processing \$10,300/\$4,000 Demonstration Facilities \$600 for the addition of types of waste not approved in the permit. \$300 Permit Reissuance, and</p>

TABLE 2	State				
	Texas TX Commission on Environmental Quality (TCEQ)	Missouri MO Dept. of Natural Resources (DNR)	Virginia VA Dept. of Environmental Quality (DEQ)	Arkansas AR Dept. of Environmental Quality (DEQ)	Pennsylvania PA Dept. of Environmental Protection (DEP)
4. Estimated revenue generated via the SW permit fees for last 2-3 yrs.	Estimated revenue generated from the surcharge tipping fee: 1999 - \$30,496,265 2000 - \$34,401,865 2001 - \$36,537,129	For all permits, less than \$20,000 each year.	The percentage of permit program costs received from permit fees are as follows: FY 1995, 17% (\$300,014) of total budget (\$1,774,669) FY 1997, 9% (\$321,404) of total budget (\$3,640,529) FY 1999, 10% (399,615) of total budget (\$3,820,266)	Revenues for 2002: Class 1 MSW Landfill: \$157,000 Class 3 Commercial SW Landfill: \$6,000 Class 3 Non-Commercial SW Landfill: \$71,500 Class 3 Tire Monofill: \$ 6,000 Class 4 C&D Landfill: \$ 22,500 Compost Organic Waste: \$2,250 Compost Mixed SW: \$450 Compost Yard Waste: \$11,700 SW Transfer Station: \$40,100 Waste Recovery Facility: \$2,700	Permit Renewal. n/a (Permit application fees go into the general fund, some of which funds their program.)
5. Are there other sources of revenue (taxes or surcharges) used to support the agency's permitting costs? If so, what is the amount?	A surcharge tipping fee is assessed quarterly based on amount of waste that operators report in their Quarterly Solid Waste Report. Landfills: \$1.25 per ton, or \$0.40 per cubic yard (compacted), or \$0.25 per cubic yard (uncompacted) MSW Processors: \$0.625 per ton, or \$0.20 per cubic yard (compacted), or \$0.125 per cubic yard (uncompacted)	No. The revenue generated through the permit fees are deposited into the Program's general revenue and the remaining costs associated with the permitting process is paid out of the general revenue.	Currently general revenue funds support the majority of the agency's costs associated with the permitting process. Virginia does not assess any specific taxes or surcharges on landfills. Permit fees collected are deposited in the Virginia Waste Management Board Permit Program Fund and are used by the Department to cover portions of the costs associated with processing permit applications.	\$1.50 per ton surcharge is designated for the Recycling Grants program. This surcharge is charged to the landfill and to haulers that take waste out of state. \$1.00 per ton surcharge is charged at the landfill and is designated for the Landfill Post-Closure Fund. Therefore, the landfill surcharges support the statewide recycling and solid waste management grants, the state marketing board for recyclables, and the landfill post-closure trust fund. In the past, it has also supported a 5 year statewide illegal dump eradication and corrective action funding program. In addition, the current sixteen regional solid waste management districts are allowed to charge fees or create other means of revenue to support local solid waste management endeavors.	\$4.00/ton for all solid waste disposed of in an MSW landfill. Includes process residue & nonprocessable waste from a resource recovery facility, unless it is permitted for beneficial use or as ADC. (New surcharge as of June 2002.) \$.25/ton for all wastes rec'd at MSW Landfills. ADC is not exempt from this fee and neither is solid waste from a hazardous waste treatment facility that is converted into non-hazardous waste. \$2.00/ton allocated to the Recycling Fund. ADC is exempt from this fee.

TABLE 2	State				
	Texas TX Commission on Environmental Quality (TCEQ)	Missouri MO Dept. of Natural Resources (DNR)	Virginia VA Dept. of Environmental Quality (DEQ)	Arkansas AR Dept. of Environmental Quality (DEQ)	Pennsylvania PA Dept. of Environmental Protection (DEP)
6. Do the permit fees cover the permit process costs? Do other revenue sources cover the costs?	The surcharge fees cover the permit process costs. No other revenues are used to cover these costs.	No. Permit fee revenue only accounts for a very small portion of the permitting process costs. All revenues associated with the permitting fees are allocated 100% to the general revenue of the Program and this is the sole source of funding for the permitting process.	No. According to recent data, permit fees only cover approximately 10% of the agency's costs to review applications.	No, the revenues generated through permit fees alone do not cover the costs of the permit operations. However, the Solid Waste Management Division is self-supporting through all of the revenue producing programs. No direct fees, including the permitting process fee, are directly designated to support the permitting process "up front". Costs for the permitting process are included in the Solid Waste Management Division's general budget that covers other areas as well, such as enforcement and other programmatic overhead.	n/a
7. Are there any other revenue sources that support SW programs or activities? If so, to what extent do they subsidize?	No	Yes. Tonnage Fees- \$2.00 per ton for MSW Landfills and \$1.33 for C&D Landfills. These fees are dedicated to the Solid Waste Management Fund and fund activities such as planning, enforcement and grants. These fees cannot be used for permitting costs. Scrap tire fee of \$.50 per tire for new tires sold at retail. This revenue is dedicated to the Scrap Tire Fund. These two additional fees cover approximately 50% of their respective total program costs. General revenue provides the balance.	Only the Virginia Waste Management Board Permit Program Fund and General Funds support the solid waste permitting program.	Yes, there are other fees, such as various percentages of landfill surcharges, waste tire program fees, solid waste management operators and control officer licensure programs that generate general revenue for the Solid Waste Management Division as well as non-revenue generating divisions within the Arkansas Department of Environmental Quality. The Solid Waste Management Division is self-supporting through all of the revenue producing programs discussed above.	Solid Waste Abatement Fund (fines) and RCRA Subtitle D grant.

TABLE 2	State				
	Texas TX Commission on Environmental Quality (TCEQ)	Missouri MO Dept. of Natural Resources (DNR)	Virginia VA Dept. of Environmental Quality (DEQ)	Arkansas AR Dept. of Environmental Quality (DEQ)	Pennsylvania PA Dept. of Environmental Protection (DEP)
8. Statewide diversion rate for the last 3 years. (And how it is calculated.)	Texas does not measure statewide diversion. The only measures are taken of waste that is diverted at the landfills and transfer stations, which provides only a slice of statewide recycling. In 1997, a study was performed that determined a 35% diversion rate for Texas. This figure is still used and referred to as the diversion rate for Texas.	1999: 36% 2000: 38% 2001: 41%	Virginia records and reports statewide recycling rates. Recycling rates from previous years can be accessed from the Department's website. 1991 Recycling Rate - 19.7% 1993 Recycling Rate - 33.43% 1995 Recycling Rate - 35% CY 2001 Recycling Rate - 37.34% (As of July 26, 2002 - 98% of Localities Reporting) Recycling rate is determined by dividing the recycled materials (including tires, oil, C&D, batteries, sludge) by the total MSW waste generated in the state.	The diversion rate is measured by the Recycling Section of the Solid Waste Management Division, based upon "honor" system reporting from facilities and Regional Solid Waste Management Districts. The rate now is approximately 30-35 percent, with a legislative mandated goal of 40 percent by 2005.	n/a
9. Enabling legislation to create SW permit fee requirements.	Detailed rules about the fee are found in Title 30, Texas Administrative Code Sections 330.601-.603. Authority for the fee is found in the Solid Waste Disposal Act, Texas Health and Safety Code.	Missouri Revised Statutes Chapter 260.205 & 260.330	Statutory Authority, Va. Code . 10.1-1402.1 and . 10.1-1402.2 Regulatory Authority 9 Virginia Administrative Code (VAC) 20-90	Regulation 9 administers permit fee requirements. State statute, is Arkansas Code Annotated 8-1-103(1), identified in Regulation 9. (Note: this formula is proposed to be simplified during the 2003 legislative session.)	PA Administrative Code, Article VIII, Chapters 271-285
10. Revenue from permit fees goes into what type of fund? (General, SW, etc.)	The total revenues are divided 50-50%. Half of the funds remain with the TCEQ in the Solid Waste Disposal Fee Fund to fund activities such as the MSW permitting, enforcement, and related support activities. The other half are provided to the State's 24 Council of Governments.	Permit fees go into the general revenue for the Solid Waste Management program.	Permit fees collected are deposited in the Virginia Waste Management Board Permit Program Fund and are used by the Department to cover portions of the costs associated with processing permit applications.	Revenues produced through the fees go into the general budget of the Solid Waste Management Division.	General fund.
11. Explanation for the process of assigning the values for the various permit fees or taxes (i.e. fees are based on the level of effort to process).	The fees were structured to recover the costs associated with the permitting process and enforcement.	The values were chosen by the Legislature.	The fees are based on the level of effort to process the permit action. The fees were first established in 1992, but recently were tripled in response to statutory changes.	The general assumption is that the fees are designed to defray the anticipated costs incurred during the permit process as well as anticipated costs incurred during the life of the permit.	Fees are based on project complexity.

TABLE 3	State	
	Nebraska NE Dept. of Environmental Quality (DEQ)	Illinois IL Environmental Protection Agency (EPA)
1. List the types of SW Mgmt facilities that require a permit.	<ul style="list-style-type: none"> ▪ MSW Disposal Area ▪ C&D Disposal Area ▪ Fossil Fuel Combustion Ash Disposal Area ▪ Delisted Waste Disposal Area ▪ Industrial Waste Disposal Area ▪ Solid Waste Compost Site ▪ Materials Recovery Facility ▪ Solid Waste Transfer Station ▪ Other Solid Waste Facility ▪ Land Application Unit for Repeated Disposal or Treatment of Special Waste 	All landfills that accept waste from off-site.
2. Rate Schedule, including initial fee and renewal fee for:	<p>Listed below are permit fees and operating fees for solid waste management facilities. Permits must be renewed every 5 years. Operating fees are paid to the state annually.</p> <p>For multiple facilities at the same location, the highest fee required for any type of facility shall be paid, plus 20% of the initial fee for each of the remaining facilities. This same method is used for fees required for major modifications to facilities on the same premises.</p>	Illinois does not charge permit fees.
Landfills	Initial permit: \$15,000 Major Modification: \$7,500 Renewal: \$750 Annual Operating Fee: \$7,500	n/a
C&D Landfill	Initial permit: \$1,500 Major Modification: \$500 Renewal: \$250 Annual Operating Fee: \$750	n/a
Resource Recovery Facilities or Incinerators	n/a	n/a
Transfer Stations	Initial permit: \$500 Major Modification: \$250 Renewal: \$150 Annual Operating Fee: \$500	n/a
Solid Waste Processing Facilities	See MRFs, transfer stations, and compost sites.	n/a
Materials Recovery Facilities	Initial permit: \$1,500 Major Modification: \$500 Renewal: \$250 Annual Operating Fee: \$1,500	n/a

TABLE 3	State		
	Nebraska NE Dept. of Environmental Quality (DEQ)	Illinois IL Environmental Protection Agency (EPA)	
Composting Facilities	Solid Waste Compost Site Initial permit: \$3,100 Major Modification: \$1,500 Renewal: \$350 Annual Operating Fee: \$2,100	n/a	
HHW Facilities	n/a	n/a	
Others:	Fossil Fuel Combustion Ash Disposal Area: Initial permit: \$2,500 Major Modification: \$1,250 Renewal: \$300 Annual Operating Fee: \$1,000	n/a	
	Delisted Waste Disposal Area: Initial permit: \$45,000 Major Modification: \$22,250 Renewal: \$2,250 Annual Operating Fee: \$45,000	n/a	
	Industrial Waste Disposal Area: Initial permit: \$3,100 Major Modification: \$1,500 Renewal: \$350 Annual Operating Fee: \$2,100	n/a	
	Other Solid Waste: Initial permit: \$750 Major Modification: \$375 Renewal: \$100 Annual Operating Fee: \$500	n/a	
	Land Application Unit for Repeated Disposal or Treatment of Special Waste: Initial permit: \$3,100 Major Modification: \$1,500 Renewal: \$350 Annual Operating Fee: \$2,500	n/a	
3. Has the permit rate schedule changed in the last 2-3 years? If so, please identify the fees.	No changes	n/a	
4. Estimated revenue generated via the SW permit fees for last 2-3 yrs.	Revenue from Permit Fees (the fees are the sum of the initial fees, the renewal fees, and the major modification fees): <div><div>2000</div><div>2001</div></div> <div>MSW Disposal Area: \$18,750 \$3,750</div> <div>C&D Disposal Area: 3,600 5,500</div>	n/a	

TABLE 3	State																																					
	Nebraska NE Dept. of Environmental Quality (DEQ)	Illinois IL Environmental Protection Agency (EPA)																																				
	<p>Fossil Fuel Combustion Ash Disposal Area: 1,250 6,550</p> <p>Delisted Waste Disposal Area: 0 0</p> <p>Industrial Waste Disposal Area: 0 3,100</p> <p>Solid Waste Compost Site: 1,500 350</p> <p>Materials Recovery Facility: 1,000 500</p> <p>Solid Waste Transfer Station: 1,550 3,100</p> <p>Other Solid Waste Facility: 0 0</p> <p>Land Application Unit for Repeated Disposal: 0 0</p> <p>Total: \$27,650 \$22,850</p> <p>Revenue from Annual Operating Fees:</p> <table> <tr> <td></td><td>2000</td><td>2001</td></tr> <tr> <td>MSW Disposal Area:</td><td>\$172,000</td><td>\$172,500</td></tr> <tr> <td>C&D Disposal Area:</td><td>6,000</td><td>6,000</td></tr> <tr> <td>Fossil Fuel Combustion Ash Disposal Area:</td><td>6,000</td><td>6,000</td></tr> <tr> <td>Delisted Waste Disposal Area:</td><td>45,000</td><td>45,000</td></tr> <tr> <td>Industrial Waste Disposal Area:</td><td>0</td><td>0</td></tr> <tr> <td>Solid Waste Compost Site:</td><td>9,600</td><td>9,600</td></tr> <tr> <td>Materials Recovery Facility:</td><td>2,700</td><td>2,700</td></tr> <tr> <td>Solid Waste Transfer Station:</td><td>16,600</td><td>17,000</td></tr> <tr> <td>Other Solid Waste Facility:</td><td>0</td><td>0</td></tr> <tr> <td>Land Application Unit for Repeated Disposal:</td><td>0</td><td>0</td></tr> <tr> <td>Total:</td><td>\$257,900</td><td>\$258,800</td></tr> </table>		2000	2001	MSW Disposal Area:	\$172,000	\$172,500	C&D Disposal Area:	6,000	6,000	Fossil Fuel Combustion Ash Disposal Area:	6,000	6,000	Delisted Waste Disposal Area:	45,000	45,000	Industrial Waste Disposal Area:	0	0	Solid Waste Compost Site:	9,600	9,600	Materials Recovery Facility:	2,700	2,700	Solid Waste Transfer Station:	16,600	17,000	Other Solid Waste Facility:	0	0	Land Application Unit for Repeated Disposal:	0	0	Total:	\$257,900	\$258,800	
	2000	2001																																				
MSW Disposal Area:	\$172,000	\$172,500																																				
C&D Disposal Area:	6,000	6,000																																				
Fossil Fuel Combustion Ash Disposal Area:	6,000	6,000																																				
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Industrial Waste Disposal Area:	0	0																																				
Solid Waste Compost Site:	9,600	9,600																																				
Materials Recovery Facility:	2,700	2,700																																				
Solid Waste Transfer Station:	16,600	17,000																																				
Other Solid Waste Facility:	0	0																																				
Land Application Unit for Repeated Disposal:	0	0																																				
Total:	\$257,900	\$258,800																																				
<p>5. Are there other sources of revenue (taxes or surcharges) used to support the agency's permitting costs? If so, what is the amount?</p>	<p>A fee of \$1.25 per ton of MSW disposed in the State of Nebraska is charged to the owner of the MSW landfill to support the agency's costs associated with the solid waste management program. In the year 2000, this fee generated \$2,309,669 and in the year 2001, it generated \$2,510,022. 50% of this fee is used for administering the solid waste program, and 50% is transferred to the grants program for solid waste and recycling projects.</p>	<p>State Landfill Fees are collected on all landfilled waste. Quarterly fees are paid to the IL EPA and then deposited into the Solid Waste Management Fund. The maximum amount that the state may levy each year is \$.45 per cubic yard or \$.95 per ton. Fees may be paid on a volume or weight basis. Fee amounts are:</p> <ul style="list-style-type: none"> Over 150,000 cubic yards: \$.45 per c.y. and/or \$.95 per ton Over 100,000 but less than 150,000 c.y.: \$25,000/year Over 50,000 but less than 100,000 c.y.: \$11,300/year Over 10,000 but less than 50,000 c.y.: \$3,450/year 10,000 c.y. or less: \$500/year <p>Local Landfill Fees may be imposed on a landfill by a local government. The following are maximum fee amounts allowed under the law:</p> <ul style="list-style-type: none"> Over 150,000 cubic yards: \$.60 per c.y. and/or \$1.27 per ton Over 100,000 but less than 150,000 c.y.: \$33,350/year Over 50,000 but less than 100,000 c.y.: \$15,500/year Over 10,000 but less than 50,000 c.y.: \$4,650/year 10,000 c.y. or less: \$650/year 																																				

TABLE 3	State	
	Nebraska NE Dept. of Environmental Quality (DEQ)	Illinois IL Environmental Protection Agency (EPA)
		Subtitle D Fees: <ul style="list-style-type: none"> Over 150,000 cubic yards: \$.055 per c.y. and/or \$.12 per ton Over 100,000 but less than 150,000 c.y.: \$3,825/year Over 50,000 but less than 100,000 c.y.: \$1,700/year Over 10,000 but less than 50,000 c.y.: \$530/year 10,000 c.y. or less: \$110/year The fees collected do not entirely cover the permit program.
6. Do the permit fees cover the permit process costs? Do other revenue sources cover the costs?	The permit fees, annual operating fees, and quarterly disposal fees combined have covered the agency's permitting process costs. No general funds or other sources are used.	No. The Agency relies on surcharges and general revenue funds. The State Landfill Fees are used by the IL EPA to provide local grant funding and to conduct household hazardous waste collection and disposal activities.
7. Are there any other revenue sources that support SW programs or activities? If so, to what extent do they subsidize?	No	No
8. Statewide diversion rate for the last 3 years. (And how it is calculated.)	Annual state recycling rates provided by the Nebraska State Recycling Association: 1998: 16.2% 1999: 17.9% 2000: 19% 2001: 15.5%	n/a
9. Enabling legislation to create SW permit fee requirements.	Integrated Solid Waste Management Act, Sections 13-2001 to 13-2043.	Illinois Compiled Statutes, Environmental Safety, Environmental Protection Act, 415 ILCS 5/22.15
10. Revenue from permit fees goes into what type of fund? (General, SW, etc.)	Integrated Solid Waste Management Cash Fund	Split 50/50 between Solid Waste Fund and other IDNR program funding.
11. Explanation for the process of assigning the values for the various permit fees or taxes (i.e. fees are based on the level of effort to process).	The fees are based on the level of effort to process permits and conduct annual inspections. Quarterly disposal fees are based on an estimate of administrative costs and to fund the grant program.	n/a

California Tiered Permits

Full Permit

- Requires operator to submit a significant amount of information, including an application, proof of compliance with the California Environmental Quality Act (CEQA), and a “report of facility information.”
- 150-day permit process (not including CEQA compliance, local land use, or other regulatory/government agency approvals).
- CIWMB concurrence is required.
- Enforcement agency issues permit with “site specific” conditions.
- Subject to State minimum standards.*
- Enforcement agency inspects monthly.

Types of facilities required to obtain a full permit:

- All Mixed Solid Waste Composting Facilities
- Large Volume Transfer/Processing Facilities (≥ 100 TPD)
- Disposal Sites (other than Contaminated Soil Disposal Sites, Nonhazardous Ash Disposal/Monofill Facilities, and Hazardous Waste Disposal Facilities)

Standardized Permit

- Requires operator to submit a significant amount of information, including an application, proof of compliance with the CEQA, and a “report of facility information.”
- 75-day permit process (not including CEQA compliance, local land use, or other regulatory/government agency approvals).
- CIWMB concurrence is required.
- Enforcement agency issues permit with “standardized” conditions set forth in regulation.
- Subject to State minimum standards.*
- Enforcement agency inspects monthly.

Types of facilities required to obtain a standardized permit:

- Green Material Composting Facilities ($> 10,000 \text{ yd}^3$)
- Animal Material Composting Facilities ($> 10,000 \text{ yd}^3$)
- Sewage Sludge Composting Facilities (Non-Class B or $> 10,000 \text{ yd}^3$)
- All Contaminated Soil Disposal Facilities
- All Nonhazardous Ash Disposal/Monofill Facilities

Registration Permit

- Requires the operator to complete a one-page application and provide limited information, including a general description of the facility, site map, location map, and facility and operator information.
- 30-day process.
- CIWMB delegates authority to concur in permit to the LEA.
- Subject to State minimum standards.*
- Enforcement agency inspects monthly.

Types of facilities required to obtain a registration permit:

- Green Material Composting Facilities ($1,000 \text{ yd}^3 < x \leq 10,000 \text{ yd}^3$)

- Animal Material Composting Facilities ($\leq 10,000 \text{ yd}^3$)
- Sewage Sludge Composting Facilities (Class B and $\leq 10,000 \text{ yd}^3$)
- Medium Volume Transfer/Processing Facilities (60 yd^3 or $15 \text{ TPD} \leq x < 100 \text{ TPD}$)
- Direct Transfer Facilities (60 yd^3 or $15 \text{ TPD} \leq x < 150 \text{ TPD}$)
- All Hazardous Waste Disposal Facilities Codisposing Nonhazardous, Nonputrescible, Industrial Solid Waste

Enforcement Agency Notification

- Requires operator to notify enforcement agency prior to commencing operations.
- Requires operator to provide minimal information, including location of the operation, location where the owner and operator may be contacted, and a description of the operation.
- No permit issued.
- Subject to State minimum standards.*
- Inspection frequency determined by enforcement agency unless set in regulation.

Types of facilities required to notify the enforcement agency:

- All Agricultural Material Composting Operations
- Green Material Composting Operations ($\leq 1,000 \text{ yd}^3$)
- Research Composting Operations ($\leq 2,500 \text{ yd}^3$)
- All Contaminated Soil Transfer/Processing Operations
- All Emergency Transfer/Processing Operations
- All Sealed Container Transfer Operations
- Limited Volume Transfer Operations ($< 60 \text{ yd}^3$ or 15 TPD)
- All Nonhazardous Ash Transfer/Processing Operations

Excluded Solid Waste Handling

- Applies to those operations that pose no environmental or public health and safety concerns.
- Allows operator to commence operations without notifying the LEA.
- No permit issued.
- Not inspected.

* State minimum standards are operational and closure-related requirements adopted by the CIWMB and applied to all solid waste facilities for the protection of public health, safety and the environment. They include requirements for the control of dust, litter, and noise; maintenance of roads and equipment; load checking for hazardous waste; the placement of cover material; and monitoring of explosive gases at landfills.

The regulations established only the tiered structure. To be applicable, the CIWMB must adopt regulations to set minimum standards and place different types of operations and facilities in the tiers. The CIWMB has adopted tiered regulations for composting, nonhazardous contaminated soil; nonhazardous ash; transfer/processing; and nonhazardous, nonputrescible, industrial solid waste.

The CIWMB is currently [revising its composting regulations](#) and is [developing tiered regulations for construction and demolition debris](#). Additional information regarding the tiered regulatory structure is available at www.ciwmb.ca.gov/LEACentral/Regs/Tiered/.

New Jersey Statutory Excerpt

SOLID WASTE REGULATIONS

N.J.A.C. 7:26

Subchapter 4. Fees for Solid Waste

7:26-4.1 General Provisions

(a) The fee schedule set forth in this subchapter shall apply to all sanitary landfill operations, thermal destruction facilities, transfer stations, processing facilities, resource recovery facilities, municipal solid waste composting, co-composting or any other methods of transportation or disposal of solid waste, excluding hazardous waste, requiring licensing and registration with the Department.

(b) Persons transporting only their own household refuse in vehicles bearing passenger license plates or persons transporting their own solid waste in vehicles registered with a motor vehicles agency as having a maximum gross weight of 9,000 pounds for a single vehicle or 16,000 pounds combined maximum gross vehicle weight for a vehicle pulling a trailer, and claiming said exemption under N.J.A.C. 7:26-3.3, need not pay any solid waste fee to the Department. Any person transporting solid waste who does not meet the criteria for exemption under this subsection shall be subject to the fee requirements applicable to transporters of solid waste set forth at N.J.A.C. 7:26-4.4.

(c) Any fee under this subchapter that is subject to N.J.A.C. 7:1L shall be payable in installments in accordance with N.J.A.C. 7:1L.

7:26-4.2 Payment of fees

(a) Fees for activities related to solid waste transporters and facilities shall be paid by certified check or money order and made payable to "Treasurer, State of New Jersey" at the following address:

New Jersey Department of Environmental Protection
Division of Solid and Hazardous Waste
PO Box 414
Trenton, NJ 08625-0414

(b) Engineering design fees and transporter registrations may be paid in person at the address set forth in (a) above.

7:26-4.3 Fee schedule for solid waste facilities

(a) The fee schedule for solid waste annual facility registration is as follows:

1. Each solid waste facility permittee shall pay an annual facility registration update fee of \$1,010. The annual facility registration update fee is due at the time the annual registration update is submitted, but in no event later than May 1 of each calendar year.

(b) Each solid waste facility permittee shall pay the applicable annual fee listed in the following table for compliance monitoring services. The fees are payable in equal quarterly installments, due on January 1, April 1, July 1 and October 1 of each year. The operator of one intermodal container facility authorized pursuant to N.J.A.C. 7:26-3.6 shall pay the annual fee listed below on January 1 of each year.

Type of Facility	Compliance Monitoring Fees
Sanitary Landfill - operating at 31,200 tons per year (tpy) or more	\$22,988
Sanitary Landfill - operating at less than 31,200 tpy	\$6,386
Transfer Stations and Materials Recovery Facilities - operating at 31,200 tpy or more	\$16,946
Transfer Stations and Materials Recovery Facilities - operating at less than 31,200 tpy	\$5,894
Thermal Destruction Facilities - operating at 9.6 tons per day or more	\$21,072
Thermal Destruction Facilities - operating at less than 9.6 tons per day	\$1,834
Intermodal Container Facilities	\$260
Solid Waste Composting and Co-Composting Facilities	\$3,144

(c) The following tables set forth the classifications of solid waste facilities:

1. Thermal destruction facilities:

Class A: small scale thermal destruction facility (as such term is defined at N.J.A.C. 7:26-1.4)

Class B: design capacity greater than 9.6 tons per day

2. Sanitary landfills:

Class A: Class I sanitary landfill (as such term is defined at N.J.A.C. 7:26-1.4)

Class B: Class II sanitary landfill (as such term is defined at N.J.A.C. 7:26-1.4)

Class C: Class III sanitary landfill (as such term is defined at N.J.A.C. 7:26-1.4)

3. Transfer stations and materials recovery facilities:

Class A: design capacity of less than 100 tons per day

Class B: design capacity of at least 100 tons per day

4. Compost facilities:

Class A: vegetative food waste and paper brought in separated form

Class B: separated compostable waste-no inorganic material (e.g. glass, metal, plastic, etc.)

Class C: mixed waste requiring manual and/or mechanical separation processes before composting

5. Sanitary landfill closure plan submissions:

Closure Plan

Class A: less than 10 acres

Class B: 10 to 30 acres

Class C: more than 30 acres

(d) The following table sets forth fees (in dollars) for services for the classes of solid wastes facilities set forth in (c) above, specified by activity. The Department may, in its discretion, refrain from commencing work or suspend work at any time until the applicant or permittee has paid the designated fee.

1. Thermal Destruction Facilities

	Class	
	A	B
a. Completeness determination	6,734	13,467
b. Engineering design report review	29,460	106,054
c. Permit renewal	21,884	58,077
d. Major modification to permit	9,595	32,826
e. Minor modification to permit	4,040	7,575
f. Transfer of ownership of permit	5,724	9,932
g. Minor technical review	1,010	2,020

2. Sanitary Landfill Facilities

	Class		
	A	B	C
a. Completeness determination	10,100	7,575	3,788
b. Engineering design report review	106,054	73,228	53,027
c. Permit renewal	63,128	42,927	25,251
d. Major modification to permit	20,201	11,615	9,090
e. Minor modification to permit	11,363	7,575	5,050
f. Transfer of ownership of permit	12,626	9,090	7,828
g. Minor technical review	1,515	1,010	505

3. Transfer Stations and Materials Recovery Facilities

	Class	
	A	B
a. Completeness determination	5,050	7,575
b. Engineering design report review	23,736	27,776
c. Permit renewal	20,706	25,251
d. Major modification to permit	11,615	20,201
e. Minor modification to permit	3,535	5,050
f. Transfer of ownership of permit	5,555	5,555
g. Minor technical review	1,010	1,515

4. Compost Facilities

	Class		
	A	B	C
a. Completeness determination	2,525	7,575	7,575
b. Engineering design report review	12,626	22,726	50,502
c. Permit renewal	11,110	17,676	27,776
d. Major modification to permit	4,040	11,615	17,676
e. Minor modification to permit	1,515	3,535	7,575
f. Minor technical reviews	1,010	1,515	1,515
g. Transfer of ownership of permit	3,535	5,555	5,555

5. Closure Plan

	Class		
	A	B	C
a. Completeness determination	1,178	1,768	2,946
b. Engineering design report review	8,417	12,626	16,834
c. Major modification to approval	2,525	3,788	5,050
d. Minor modification to approval	842	1,683	2,525
e. Transfer of ownership of approval	1,683	2,525	3,788
f. Minor technical review	421	842	1,263

Appendix C

Full Cost Analysis Schedules

Iowa Department of Natural Resources
Analysis of Model Permit Fee Structures
Permitting Related Costs (FY 2003)
Schedule 1

	Solid Waste Permitting	Permit Related Comprehensive Planning	Field Services	HHW Collection Facilities	Appliance Demanufacturing	Total
Direct Costs						
Personal Services						
Supervisor	\$ 42,633	\$ -	\$ -	\$ -	\$ -	\$ 42,633
Environmental Engineer	71,256	-	-	-	-	71,256
Environmental Engineer Senior	60,904	-	-	-	-	60,904
Environmental Engineer	71,253	-	-	-	-	71,253
Environmental Engineer	71,556	-	-	-	-	71,556
Administrative Assistant	37,908	-	-	-	-	37,908
Environmental Specialist	50,000	-	-	-	-	50,000
PP3	-	24,362	-	-	-	24,362
PP2	-	20,156	-	-	-	20,156
PP2	-	12,402	-	-	-	12,402
PP2	-	13,097	-	-	-	13,097
Technical Assistant	24,350	-	-	-	-	24,350
Administrative Assistant	36,000	-	-	-	-	36,000
Labor	-	-	315,167	4,144	22,336	341,647
Sub-total	\$ 465,860	\$ 70,016	\$ 315,167	\$ 4,144	\$ 22,336	\$ 877,523
Travel						
In State ⁽¹⁾	\$ 3,200	\$ 2,800	\$ 5,000	\$ 300	\$ 100	\$ 11,400
Out of State	4,800	1,800	1,000	800	1,000	9,400
Sub-total	\$ 8,000	\$ 4,600	\$ 6,000	\$ 1,100	\$ 1,100	\$ 20,800
Supplies	\$ 420	\$ 280	\$ 1,500	\$ -	\$ 200	\$ 2,400
Printing & Binding	1,500	3,000	-	-	100	4,600
Prof. Services	20,000	-	-	-	-	20,000
Outside Service	-	-	1,000	-	-	1,000
Advertising & Publicity	-	-	-	-	-	-
Training	1,800	1,200	2,000	30	300	5,330
Equipment	1,500	1,500	10,000	-	500	13,500
Equipment Maintenance	-	-	-	-	-	-
Communications	3,900	2,600	10,000	300	700	17,500
Data Processing	2,100	1,400	-	30	100	3,630
Other Expenses	2,400	1,600	-	100	200	4,300
Sub-total	\$ 33,620	\$ 11,580	\$ 24,500	\$ 460	\$ 2,100	\$ 72,260
Total Direct Costs	\$ 507,480	\$ 86,196	\$ 345,667	\$ 5,704	\$ 25,536	\$ 970,583
Indirect Costs						
Administration	\$ 21,896	\$ -	\$ -	\$ -	\$ -	\$ 21,896
Communications	11,000	-	-	-	-	11,000
Legal	14,819	-	-	-	-	14,819
Total Indirect Costs	\$ 47,715	\$ -	\$ -	\$ -	\$ -	\$ 47,715
Total Direct & Indirect Costs	\$ 555,195	\$ 86,196	\$ 345,667	\$ 5,704	\$ 25,536	\$ 1,018,298
Overhead	\$ 74,396	\$ 11,550	\$ 46,319	\$ 764	\$ 3,422	\$ 136,452
Total Costs	\$ 629,591	\$ 97,746	\$ 391,986	\$ 6,468	\$ 28,958	\$ 1,154,749

⁽¹⁾ This assumes increased travel time per the proposed expansion of services.

<p align="center">Iowa Department of Natural Resources Analysis of Model Permit Fee Structures Permitting Related Costs (Adjustments to FY 2003 Costs) Schedule 2</p>
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	Solid Waste Permitting	Permit Related Comprehensive Planning	Field Services	HHW Collection Facilities	Appliance Demanufacturing	Total
Total Costs	\$ 629,591	\$ 97,746	\$ 391,986	\$ 6,468	\$ 28,958	\$ 1,154,749
Adjustments:						
Less Field Services (50% permit related est.)	-	-	195,993	-	-	195,993
Adjusted Total	\$ 629,591	\$ 97,746	\$ 195,993	\$ 6,468	\$ 28,958	\$ 958,756

**Iowa Department of Natural Resources
Analysis of Model Permit Fee Structures
Permitting Related Costs , By Fee Category
Schedule 3**

Potential Permitting Categories	MSW Landfill Permits			C&D, CCR, & Industrial ⁽¹⁾			Closed Landfills	Transfer Stations		Citizen Convenience Centers		Land Applications	
	New	Renewals	Amendments	New	Renewals	Amendments		New	Renewals	New	Renewals	New	Renewals
Solid Waste Permitting	\$ -	\$ 152,361	\$ 228,541	\$ -	\$ 70,514	\$ 105,771	\$ 28,332	\$ -	\$ 15,740	\$ -	\$ 1,574	\$ -	\$ 3,148
Comprehensive Planning	\$ -	\$ 83,084	\$ -	\$ -	\$ 7,820	\$ -	\$ -	\$ -	\$ 4,399	\$ -	\$ 244	\$ -	\$ 244
Field Services	\$ -	\$ 47,430	\$ 71,146	\$ -	\$ 21,951	\$ 32,927	\$ 8,820	\$ -	\$ 4,900	\$ -	\$ 490	\$ -	\$ 980
HHW Collection Facilities	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Appliance Demanufacturing	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total	\$ -	\$ 282,875	\$ 299,687	\$ -	\$ 100,285	\$ 138,698	\$ 37,151	\$ -	\$ 25,038	\$ -	\$ 2,308	\$ -	\$ 4,372

Potential Permitting Categories	Processing Facilities ⁽²⁾			Composting Facilities			HHW Facilities			Appliance Demanufacturing		Total
	New	Renewals	Amendments	New	Renewals	Amendments	New	Renewals	Amendmen	New	Renewals	
Solid Waste Permitting	\$ -	\$ 4,407	\$ 1,889	\$ -	\$ 4,407	\$ 1,889	\$ -	\$ 2,754	\$ 2,754	\$ -	\$ 5,509	\$ 605,981
Comprehensive Planning	\$ -	\$ 489	\$ -	\$ -	\$ 489	\$ -	\$ -	\$ 489	\$ -	\$ -	\$ 489	\$ 95,791
Field Services	\$ -	\$ 1,372	\$ 588	\$ -	\$ 1,372	\$ 588	\$ -	\$ 857	\$ 857	\$ -	\$ 1,715	\$ 188,643
HHW Collection Facilities	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,234	\$ 3,234	\$ -	\$ -	\$ -
Appliance Demanufacturing	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 28,958	\$ -
Total	\$ -	\$ 6,268	\$ 2,477	\$ -	\$ 6,268	\$ 2,477	\$ -	\$ 7,335	\$ 6,846	\$ -	\$ 36,670	\$ 890,416

⁽¹⁾ Construction & Demolition, Coal Combustion Residue, Industrial Monofills.

⁽²⁾ Dirty MRF's, C&D Processors (recyclers).

Comprehensive Planning- MSW landfill, C&D, CCR and Industrial Permit Costs: Due to the nature of permitting process, renewal and amendment costs are combined.

**Iowa Department of Natural Resources
Analysis of Model Permit Fee Structures
Permit Fee "What If" Analysis
Schedule 4**

	MSW Landfill Permits			C&D, CCR, & Industrial			Closed Landfills	Transfer Stations		Citizen Convenience Centers		Land Applications	
	New	Renewals	Amendments	New	Renewals	Amendments		New	Renewals	New	Renewals	New	Renewals
Costs	\$ -	\$ 282,875	\$ 299,687	\$ -	\$ 100,285	\$ 138,698	\$ 37,151	\$ -	\$ 25,038	\$ -	\$ 2,308	\$ -	\$ 4,372
Annual Number of Activities Per Year	N/A	20	120	N/A	8	50	48	N/A	8	N/A	2	N/A	8
Cost Per Activity	-	\$ 14,144	\$ 2,497	-	\$ 12,536	\$ 2,774	\$ 774	-	\$ 3,130	-	\$ 1,154	-	\$ 547

	Processing Facilities			Composting Facilities			HHW Facilities			Appliance Demanufacturing		Total
	New	Renewals	Amendments	New	Renewals	Amendments	New	Renewals	Amendments	New	Renewals	
Costs	\$ -	\$ 6,268	\$ 2,477	\$ -	\$ 6,268	\$ 2,477	\$ -	\$ 7,335	\$ 6,846	\$ -	\$ 36,670	\$ 890,416
Annual Number of Activities Per Year	N/A	2	2	N/A	2	3	N/A	3	3	N/A	20	-
Cost Per Activity	-	\$ 3,134	\$ 1,238	-	\$ 3,134	\$ 826	-	\$ 2,445	\$ 2,282	-	\$ 1,834	-

N/A- Not applicable because there is no historical basis for this cost category.

<p align="center">Iowa Department of Natural Resources Analysis of Model Permit Fee Structures Landfill Amendments, by Level of Effort Schedule 5</p>
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MSW Landfill Amendment Costs: \$ 299,687

	Percentage of Time	Amendment Costs	Annual Number of Activities Per Year	Cost, by Type of Amendment
Hi Level of Effort	52%	\$ 155,837	23	\$ 6,776
Medium Level of Effort	24%	71,925	23	3,127
Low Level of Effort	24%	71,925	74	972
	100%	\$ 299,687	120	